SIMTA Intermodal Terminal Facility- Stage 1

Preliminary Construction Environmental Management Plan

SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant Development

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SYDNEY INTERMODAL TERMINAL ALLIANCE INTERMODAL TERMINAL FACILITY - STAGE 1

Environmental Impact Statement

Preliminary Construction Environmental Management Plan

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Report No 1

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1 INTRODUCTION

1.1 BACKGROUND

The SIMTA Project involves the development of an intermodal facility, including warehouse and distribution facilities, freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the eastern side of Moorebank Avenue, Moorebank (the SIMTA site). The SIMTA Project also includes a Rail link, within an identified rail corridor (the Rail Corridor), which connects from the southern part of the SIMTA site to the Southern Sydney Freight Line (SSFL) (the entire area, SIMTA site and Rail Corridor referred to as the Project site). The SIMTA Project is to be developed in three key stages:

- Stage 1- Construction of the Intermodal Terminal Facility and Rail link
- Stage 2- Construction of warehouse and Distribution Facilities
- Stage 3- Extension of the Intermodal Terminal Facility and completion of Warehouse and Distribution Facilities.

A summary of the approvals undertaken to date for the SIMTA site, relating to the SIMTA Project, include:

- EPBC Approval (No. 2011/6229) granted in March 2014 for the impact of the SIMTA Project on listed threatened species and communities (sections 18 and 18A of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)) and Commonwealth land (sections 26 and 27A of the EPBC Act).
- Concept Approval (No. 10_0193) granted by the Planning Assessment Commission (PAC) on the 29 September 2014 for the 'Concept Approval' of the SIMTA Project under Part 3A of the EP&A Act.

Both of these approvals involved the preparation of design and environmental assessment documentation.

1.2 PROPOSAL DESCRIPTION

The Proposal includes the following key components, with the first three components comprising the intermodal terminal (IMT):

- Truck processing and loading areas.
- Rail loading and container storage areas.
- Administration facility and associated car parking.
- The Rail link – located within the Rail Corridor, including a connection to the IMT facility, traversing of Moorebank Avenue, Anzac Creek and Georges River and connection to the SSFL.

The overall construction plan, including the construction area boundary, is shown in Figure 1-1.

Figure 1: SIMTA Stage 1 Location Plan and key areas

Figure 1-1 Location plan and key areas (including construction footprint)

1.3 CONSTRUCTION METHODOLOGY OVERVIEW

The duration of construction for the Proposal is anticipated to be approximately 18 months. The construction phase is generally divided into two main areas being the Stage 1 site and the Rail link. The Construction area for the Proposal is shown in in Figure 1-1 and the *Preliminary Construction Works Drawings*, which are included as Appendix J to the Environmental Impact Statement (EIS) for the Stage 1 Proposal. These works generally involve:

- Establishment of a construction compound for the Stage 1 site (the IMT compound) providing car parking, offices, amenities, laydown and storage, and potentially a batching plant.
- Establishment of three secondary construction compounds to support the Rail link construction (the Rail East Compound, the Georges River Bridge Compound and the Rail West Compound) providing car parking, offices, amenities, laydown and storage, and material testing areas.
- Clearing of approximately 1.25 hectares (ha) of native vegetation.
- Construction of the Stage 1 site (including the IMT facility and associated infrastructure).
- Construction of the Rail link from the SSFL to the Stage 1 site, including a bridge over the Georges River, a culvert over Anzac Creek and alteration to the Moorebank Avenue bridge (over the East Hills Rail Corridor)
- Movement of fill material from the undeveloped cleared high point located along the eastern boundary of the SIMTA site to the Stage 1 site (Operational area) and the Rail link.
- Construction of access and egress to and from the Stage 1 site from Moorebank Avenue.
- Construction of access and egress to and from the Rail link from Moorebank Avenue and Cambridge Avenue (through the Glenfield Waste Facility).

1.4 CONSTRUCITON PROGRAMME

Subject to planning approval, construction of the Proposal is planned to commence in the first quarter of 2016. The total period of construction works for the Proposal is expected to be approximately 18 months. Construction works have been divided into five ‘works periods’ which are interrelated and also may potentially overlap. Subject to confirmation of construction, the order of these construction works periods may shift slightly. The indicative construction program is shown in Table 1-1.

Table 1-1 Indicative construction program

A summary of the indicative activities included in each of these works periods, which is relevant to both the Stage 1 site (IMT) and the Rail link construction, is provided in Table 1-2.

Table 1-2 Works periods and activities

Works period	Activity
Works period 1 - Site preparation activities	▪ Demolition ▪ Clearing vegetation ▪ Temporary Works ▪ Enabling Works
Works period 2 - Earthworks, drainage and utilities	▪ Bulk Earthworks ▪ Drainage and utilities installation
Works period 3 - Engineering Fill	▪ Engineering fill
	▪ Rail formation
	▪ Bridge Construction/Modifications
Works period 4 -Pavement construction and rail alignment construction	▪ Pavement construction
	▪ Permanent ways and rail systems
	▪ Bridge Construction/Modifications
Works period 5 – Miscellaneous structural construction, utilities, finishing works,	▪ Misc. structural construction, utilities, finishing works ▪ Commissioning ▪ Decommissioning/Demobilisation of Proposal site

It is envisaged that the construction and operation would be undertaken in phases to allow for the early operation of the Stage 1 site, and the transition to a gantry crane operation as demand requires. The anticipated phases are described in Table 1-3.

Table 1-3 Proposal Phases

Phase	Description
A	▪ Construction of the Rail link, rail sidings, the western portion of the Stage 1 IMT and the ancillary operational facilities.
B	▪ Operation of the western portion of the Stage 1 IMT using mobile container handling equipment such as manual forklifts and reach stackers. ▪ Construction of the remainder (eastern) portion of the Stage 1 IMT including erection of gantry cranes.
C	▪ Operation of the eastern portion of the Stage 1 IMT using gantry crane systems. ▪ Refurbishment of the western portion of the Stage 1 IMT for gantry crane systems.
D	▪ Operation of the entire Stage 1 IMT using gantry systems.

1.5 PURPOSE OF THIS PRELIMINARY CEMP

This Preliminary CEMP aims to provide a structured approach to the development of the CEMP and management of environmental issues during the construction of the Proposal.

The CEMP for construction of the Rail link and IMT must be prepared in accordance with:

- This Preliminary CEMP.
- *Guideline for the Preparation of Environmental Management Plans* (DIPNR, 2004).
- AS/NZS ISO 14001 – Environmental Management Systems.

Implementing the CEMP effectively will ensure that the Project team meets regulatory and policy requirements in a systematic manner and continually improves its performance.

2 CEMP REQUIREMENTS

The following sections outline the requirements for the CEMP for construction of the Proposal.

2.1 PURPOSE OF THE CEMP

CEMP must be prepared for construction of the Rail link and construction of the IMT for the Proposal. The Construction Contractor engaged for each package of works will be responsible for developing the CEMP.

The objectives of the CEMP would be to:

- Describe the package of works in detail, including activities to be undertaken and relative timing.
- Provide specific mitigation measures and controls that can be applied on-site to avoid or minimise negative environmental impacts.
- Provide specific mechanisms for compliance with applicable policies, approvals, licences, permits, consultation agreements and legislation.
- Describe the environmental management related roles and responsibilities of personnel.
- State the objectives and targets for issues that are important to the environmental performance of the Proposal.
- Outline the monitoring regime to check the adequacy of controls as they are implemented during construction.

The objectives of the CEMP must be clearly stated within the CEMP.

2.2 CONSULTATION

Extensive consultation for the Proposal commenced during the EIS for the Concept Plan for the SIMTA Project, and has continued through development of the EIS for the Stage 1 Proposal. The main objective of consultation was to keep stakeholders informed and involved during each stage of SIMTA Project.

Relevant government agencies were invited to participate in a Planning Focus Meeting at the SIMTA site as part of the Concept Plan EIS. Representatives of the following agencies partook:

- Department of Sustainability, Environment, Water, Population and Communities (now the Department of the Environment).
- Department of Finance and Deregulation.
- Department of Planning and Infrastructure (now Department of Planning and Environment (DP&E)).
- Office of Environment and Heritage (OEH).
- NSW Roads and Traffic Authority (now NSW Roads and Maritime Services).
- Transport for NSW.
- NSW Rural Fire Service.
- NSW Industry and Investment.
- RailCorp NSW.
- Australian Rail Track Corporation.

- Sydney Ports Corporation.
- Liverpool City Council.

Consultation was also undertaken with service utility providers and has continued through the design development, including:

- Sydney Water Corporation for potable water and sewer.
- Endeavour Energy for electrical supply.
- Jemena for gas supply.
- Telstra for telecommunications
- AGL Upstream Investments Pty Ltd.
- Sydney Trains.

Consultation was also undertaken with a range of authorities to address the key issues as identified within the Secretary's Environmental Assessment Requirements (SEARs) to guide the content of the Proposal EIS. The authorities are listed below:

- Commonwealth Department of the Environment (DOTE).
- Environment Protection Authority (EPA).
- Office of Environment and Heritage (OEH).
- Transport for NSW (TfNSW).
- Department of Primary Industries (Fisheries and Office of Water) (DPI(F) & NOW).
- NSW Rural Fire Service (RFS).
- NSW Health.
- Sydney Ports Corporation.
- Liverpool City Council.
- Campbelltown City Council.
- Roads and Maritime Services.
- Australian Rail Track Corporation (ARTC).
- Local Aboriginal Land Councils.

Mitigation measures proposed in the EIS and captured in this Preliminary CEMP have been developed having regard to issues and comments raised during consultation.

Further consultation with relevant stakeholders and government authorities must continue through the development of the CEMP and sub plans.

Consultation undertaken must be captured within the CEMP and key concerns of each authority should be documented.

2.2.1 COMMUNITY CONSULTATION

The Construction Contractor will be responsible for consultation with the community throughout the construction phase of the Proposal. A community information and awareness strategy must be developed and incorporated into the CEMP.

The Construction Contractor must prepare a community information and awareness strategy to be incorporated into the CEMP.

2.3 CERTIFICATION AND APPROVAL

CEMP for construction of the Proposal will require approval of the Minister of DOTE prior to commencement of construction, in accordance with the EPBC Approval (Clause 7).

It is anticipated that the CEMP for construction of the will require approval of the DP&E prior to commencement of construction. The CEMP must be approved by SIMTA's Principal Representative prior to submission to DOTE and DP&E. To allow adequate time for review, submission to DP&E would be required no later than one month prior to commencement of construction, or as otherwise agreed.

It is anticipated that sub-plans prepared for the Proposal would also would require approval by SIMTA's Principal Representative, the Secretary and DOTE prior to commencement of construction. Further explanation and details of these documents are provided in Section 4.1.2.

2.4 DISTRIBUTION

The latest version of the CEMP must be made available to all construction personnel and sub-contractors.

The document is uncontrolled when printed. One controlled hard copy of the CEMP and supporting documentation would be maintained by the Construction Contractor and be held at the main compound for the relevant package of works.

Registered copies would be distributed to the following personnel, responsible for each package of works:

- SIMTA Principal Representative.
- Environmental Manager.
- Construction Manager.
- Health and Safety Manager.

2.5 REVISION

A document review process must be implemented to ensure that the CEMP is updated appropriately for the specific works occurring on-site. This includes continual improvement reviews (see Figure 7-3), where necessary.

If the review process identifies any issues within the documents that are either redundant or in need of updating, the Environmental Manager is responsible to prepare the revised documentation.

The revised document would be reviewed by SIMTA's Principal Representative and certified by the Principal Contractor. The Environmental Manager can approve any minor changes to the CEMP.

If significant changes are made and the Environmental Manager deems it necessary, the amended CEMP would be forwarded to the Secretary and DOTE for approval.

3 PLANNING

3.1 CRITERIA FOR COMPLIANCE - APPROVALS, PERMITS AND LICENSING

A register of approval requirements for each package of works must be developed and included in the CEMP. The register would be maintained by the Environmental Manager for the relevant package of works, and appropriate on-site personnel. The register would be reviewed prior to commencement of each stage of construction and where necessary during construction.

Works for the Proposal must be undertaken in accordance with the following planning approvals and licences.

- Concept Plan Approval (MP 10_0193) granted on 29 September 2014 for the development of the SIMTA IMT Facility at Moorebank, including the Statement of Commitments (SoC).
- EPBC Approval (No. 2011/6229) granted under the *Environment Protection and Biodiversity Conservation Act* 1999 (EPBC Act) on March 2014 by the Commonwealth Department of Environment for the development of the SIMTA IMT Facility at Moorebank.
- Environment protection licences (EPL) under the *Protection of the Environment Operations Act* 1997 (**POEO Act**) that is required for construction of the Rail link.
- Mitigation measures identified in the Proposal EIS.
- Any Conditions of Approval issued for the Proposal (SSD 14-6766).

The following sections of the CEMP must capture the approval, legislative and licensing requirements for the Proposal.

3.2 LEGAL AND OTHER REQUIREMENTS

A register of legal and other requirements for the package of works must be developed and included as an appendix to the CEMP. The register should be in the form of a checklist and be reviewed at regular intervals.

Any changes made to the legal requirements register must be communicated to the wider team where necessary.

Construction Contractor to review legal requirements and develop legal requirement register based on the construction methodologies adopted. The requirements below are indicative only and must be confirmed by the Contractor.

3.2.1 CONCEPT PLAN APPROVAL

Table 3-4 Applicable Ministers Conditions of Approval under MP 10_0193

MCoA Number	Description/Condition	Activity	CEMP or Sub-plan
1.13	This Concept Plan approval does not remove any obligation to obtain, renew, or comply with licences, permits or approvals as required by law associated with any project subject to this Concept Plan approval.	General construction	CEMP
2.1 Rail	An assessment of the impacts of the rail link on the Glenfield Waste Facility in consultation with the EPA, including: d) the proposed methodology to ensure that the landfill barrier system disturbed in the removal process is replaced/ repaired to ensure its ongoing performance. The Proponent should detail matters such as sub grade preparation/ specifications, line installation/ reinstallation procedures and construction quality assurance procedures; e) a commitment to providing the EPA with a construction quality assurance report within 60 days of the completion of the works referred to in (d) above	General construction – Rail link	Contaminated Land Management Plan

3.2.2 STATEMENT OF COMMITMENTS - CONCEPT PLAN

Table 3-5 Concept Plan Statement of Commitments

Subject	Description/Condition	Activity	CEMP / Subplan
Traffic and Access	The Proponent commits to developing a Construction Traffic Management Plan to minimise the potential impacts of the construction stage(s), including: ▪ Heavy vehicle access routes ▪ Location of construction worker parking ▪ Mitigation measures to avoid any unacceptable impacts on the surrounding land uses. ▪ Mitigation measures to avoid any unacceptable impacts on regular bus services and school bus services operating on roads within the vicinity of the site and pedestrian and cyclist access.	General construction	Construction Traffic Management Plan
Noise and vibration	Prior to undertaking demolition and construction on site, a Construction Noise and Vibration Management Plan should be prepared based on details of the proposed construction methodology, activities and equipment. This should identify potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in this report) that may be implemented to minimise any potential impacts, including engineering and management controls.	General construction	Construction Noise and Vibration Management Plan (CNVMP)

Subject	Description/Condition	Activity	CEMP / Subplan
	All construction activities will have regard to the standard hours of 7:00am to 6:00pm Monday to Friday and 8:00am to 1:00pm Saturday (with approval from relevant authorities). Any works undertaken outside of these hours will be undertaken in consultation with relevant authorities. Works outside these hours that may be permitted will include: ▪ Any works which do not cause noise emissions to be audible at any nearby sensitive receptors. ▪ The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. Local residents, commercial and industrial premises will be informed of the timing and duration of approved works in accordance with the notification provisions outlined in the CNMP. ▪ Emergency work to avoid the loss of lives, property and/or to prevent environmental harm. ▪ Any other work as approved through the CNMP process	General construction	Construction Noise and Vibration Management Plan (CNVMP)
Biodiversity	▪ Implementation of Construction and Operation Management Plans for maintenance of structures in riparian and aquatic zones. ▪ Minimise siltation of the Georges River during construction through implementing the water quality mitigation measures detailed within the Stormwater and Flooding section of the Statement of Commitments.	Georges River Bridge works and culvert crossing works	Soil and Water Management Plan (SWMP)
	▪ Lantana removal within nominated construction zones to reduce degradation of streamside vegetation and offset any potential impacts to aquatic biodiversity	Vegetation clearing	Vegetation Management Plan
	▪ Riparian corridors will be appropriately re-vegetated to restore and/or maintain ecological, functional and habitat values and impede surface flows and drop sediment before it reaches the waterways.	Bridge works, culvert crossing works and drainage works	Vegetation Management Plan
	▪ Water quality and quantity issues will be managed during the construction phase through the implementation, inspection and maintenance of best practice soil and water management techniques which will be defined in the CEMP for sedimentation and erosion control during construction.	General construction	SWMP

Subject	Description/Condition	Activity	CEMP / Subplan
Hazards and Risks	Asbestos ▪ The Proponent will develop an asbestos management plan for the SIMTA proposal containing a risk assessment undertaken in accordance with Code of Practice for the Management and Control of Asbestos in the Workplace (NOHSC, 2005). ▪ Where the management plan recommends the removal of asbestos from site all works will be undertaken in accordance with the Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005), including the development of an asbestos removal control plan and an emergency plan.	Demolition	Asbestos Management Plan
	▪ The Proponent commits to the preparation of a Construction and Operational Management Plan prior to the commencement of site operations for control/mitigation and management of any spillage/leaks etc.	General construction	Emergency Response Plan Pollution Incident Response Management Plan – Rail Link
	▪ The Proponent commits to the development of a Bushfire Management Plan for both the construction and operational phases of the SIMTA proposal that aligns with the requirements of the local RFS Bushfire Management Committee operational plans of management.	General construction	Bushfire Management Plan
Contamination	Developing a Contamination Management Plan with detailed procedures on: ▪ Handling, stockpiling and assessing potentially contaminated materials encountered during the development works; ▪ Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill; ▪ Assessment, classification and disposal of waste in accordance with relevant legislation; and ▪ A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works.	General construction	Contaminated Land Management Plan

Subject	Description/Condition	Activity	CEMP / Subplan
	The Proponent will undertake the following tasks in association with the detailed planning applications for the Rail link: ▪ Developing and implementing a contamination management plan as part of the project construction environmental management plan for managing contaminated materials either expected or unexpectedly encountered during the construction of the rail corridor. The contamination management plan would include detailed procedures on: ▪ Handling, stockpiling and assessing potentially contaminated materials encountered during the ▪ development works; ▪ Assessment, classification and disposal of waste in accordance with relevant legislation; and ▪ A contingencies plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials that may be encountered during site	General construction – Rail link	Contaminated Land Management Plan – Rail Link
Stormwater and Flooding	▪ Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases. ▪ Implementation of management plan strategies prior to commencement of the staged construction phase. ▪ Monitoring and review performance of sediment and water control structures during construction and operation phases.	General construction	SWMP
Air Quality	The Proponent will undertake an air quality monitoring programme during the initial phases of both construction and operation of the SIMTA site in accordance with the Air Quality Impact Assessment and including: ▪ Nuisance Dust ▪ Air Emissions – PM_{10} and Nitrogen Dioxide (NO)	General construction	Air Quality Management Plan (AQMP)
	The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each stage to provide air quality and dust management/ mitigation procedures to be adopted during each of the construction phases of the development.	General construction	AQMP
Indigenous heritage	The Proponent commits to the implementation of the following General Mitigation Measures in the Aboriginal Cultural Heritage Assessment and including:	General construction	Heritage Management Plan

Subject	Description/Condition	Activity	CEMP / Subplan
	▪ Consultation between SIMTA and relevant Registered Aboriginal Parties (RAPs) throughout the design and construction of the SIMTA proposal. ▪ In the event that previously undiscovered Aboriginal objects, sites or places (or potential Aboriginal objects, sites or places) are discovered during construction, all works in the vicinity of the find should cease and SIMTA should determine the subsequent course of action in consultation with a heritage professional, relevant Registered Aboriginal Parties and/or the relevant State government agency as appropriate. ▪ Should suspected human skeletal material be identified, all works should cease and the NSW Police and the NSW Coroner's office contacted. Should the burial prove to be archaeological of Aboriginal origin, consultation with a heritage professional, relevant RAPs and/or the relevant State government agency, should be undertaken by SIMTA.		
Utilities	▪ The Proponent will protect and relocate (where required) the existing services passing through the site, including stormwater, sewer, water, telecommunications and electricity.	General construction	CEMP / Health and Safety Plan
	▪ The Proponent will undertake to source all water supplies for the project from an authorised and reliable source.	General construction	SWMP
	▪ The Proponent will obtain authorisation for the taking of water for purposes other than water supply, including for dewatering during construction.	General construction	SWMP
Climate change risk	▪ Control of performance of hotworks on total fire ban days during construction and operation, particularly within any defined asset protection zones	Demolition General construction	Bushfire Management Plan
Waste management	The Proponent commits to undertaking waste management in the demolition, construction and operational phases of the development as listed below: Demolition ▪ Re-use of material will have priority over recycling ▪ Recycling will have priority over disposal ▪ Selection of reputable waste removal contractors who will guarantee that recyclable material will be recycled and will provide any relevant certificates	Demolition	Construction Waste Minimisation and Management Plan

Subject	Description/Condition	Activity	CEMP / Subplan
	▪ Vegetation removed shall be either preserved for use in the new development, or mulched for inclusion in landscaping activities. The remainder will be sent to a composting facility ▪ Excavated earth will be used for infill and landscaping where feasible, the remainder will be sent to a recycling facility ▪ Asphalt will be re-used by transferring it to a batching plant or using it as a base layer for access roads ▪ Concrete components will where possible be crushed and reused on site, the remainder will be sent to a recycling facility ▪ Fuel and oil storage from demolition machinery will be secured and managed responsibly within compound sites during works, and removed upon completion of works ▪ Sewage waste shall be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements		
	Construction ▪ Reduce potential waste by ordering the correct quantities of materials ▪ Coordinate and sequence trades people to minimise waste ▪ Prefabricate materials where possible ▪ Use modular construction and basic designs to reduce the need for off-cuts ▪ Reuse formwork ▪ Reuse or recycle materials from the demolition phase ▪ Separate off-cuts to facilitate reuse, resale or efficient recycling ▪ Minimise site disturbance and limit unnecessary excavation ▪ Select landscaping which reduces green waste ▪ Select waste removal contractors to guarantee that recyclable waste are recycled ▪ Engage with the supply chain to supply products and materials that use minimal packaging ▪ Set up schemes with suppliers to take back packaging materials ▪ Sewage waste shall be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements.	General construction	Construction Waste Minimisation and Management Plan

3.2.3 EPBC APPROVAL

Table 3-6 Conditions of EPBC Approval

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
1.	For the better protection of the Grey-headed Flying-fox (GHFF), the person taking the action must: a) not clear more than 11 hectares of GHFF foraging habitat, b) engage a suitably qualified expert to undertake a pre-clearance survey(s) to confirm the absence of GHFF roosting camps within the rail easement, no more than 48 hours prior to the clearance of potential GHFF roosting habitat; and c) notify the Department in writing of the results of pre-clearance surveys. If the GHFF is detected roosting on site, all native vegetation clearance activities must halt until the person taking the action has complied with any directions the Minister may wish to issue regarding timing of construction or methods for dispersal of the GHFF	Vegetation clearing	Flora and Fauna Management Plan
2.	For the better protection of the Macquarie Perch, the person taking the action must: b) implement all feasible and practicable measures that ensure sedimentation and / or erosion (as a result of the proposed action) do not lead to any further reductions in the water quality, or degradation of, Macquarie Perch habitat.	General construction	SWMP CF&FMP
5.	For the better protection of EPBC listed flora & the environment on Commonwealth land, the person taking the action must engage a suitably qualified expert to prepare a Flora and Fauna Management Plan (CF&FMP) for the approval of the Minister. The CF&FMP must include (but need not be limited to): a) details on the timing of native vegetation clearance works; b) detailed maps of the Rail link easement and construction zone showing: i. permanent infrastructure and temporary works; ii. no-go areas; and	General construction	CF&FMP Vegetation Management Plan

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
	iii. physical barriers used for the protection of native vegetation on Commonwealth land, and of EPBC Act listed Nodding Geebung and Small-flower Grevillea. c) measures to minimise the extent of native vegetation clearing upon Commonwealth land and the clearing of Nodding Geebung and Small-flower Grevillea; d) provisions to ensure no more than 17 individuals of Nodding Geebung and 634 stems of Small-flower Grevil/ea are cleared; e) the results of targeted surveys for Hibbertia sp. Bankstown and Bynoe's Wattle (including the number of individuals recorded) and what measures will be implemented to avoid, mitigate and manage impacts to these species, if individuals are found on site; f) measures which allow terrestrial fauna to disperse naturally ahead of clearing activities, and minimise the risk of injury to individuals; g) actions to maintain or enhance the long-term viability of native vegetation adjoining the rail easement in particular, adjoining populations of Nodding Geebung and Smallflower Grevillea; h) measures to safeguard flora and fauna from the threat of weeds, fire, pathogens and unauthorised access, including (but not limited to) the commitments outlined in section 7.4.1 of the EIS (and summarised at Annexure A); i) ongoing monitoring to inform the adaptive management of native vegetation adjoining the rail easement. Native vegetation clearance must not occur until the CF&FMP has been approved. The CF&FMP must be implemented once approved.		
7	For the better protection of Commonwealth land, the person taking the action must engage a suitably qualified expert(s) to prepare a Construction Environment Management Plan (CEMP), for the approval of the Minister. The CEMP must include in relation to construction of the proposed facility: a) details on the timing of construction works (accompanied by current and detailed maps);	General construction	CEMP

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
	b) identification and quantification of all potential impacts associated with noise, vibration, air quality, traffic, light spill, hydrological changes, contamination, and indigenous heritage (including cumulative impacts associated with the DoPs proposed intermodal) upon Commonwealth land. Consideration must be given to people and communities at SME, DNSDC, Defence housing, and the environment more generally in neighbouring bushland areas. Of note, the air quality assessment must quantify all emissions arising from air pollutant sources for which there are established national air quality standards;	General construction	CNVMP CTMP SWMP Contaminated Land Management Plan Heritage Management Plan
	c) the results of further investigations with regard to land contamination and indigenous heritage impacts (specifically, PADs two and three). If adverse impacts are identified, details on how such matters will be managed I mitigated must also be provided. Evidence of ongoing consultation with RAPs regarding further investigations for indigenous heritage objects/places must be provided;	General construction	Contaminated Land Management Plan Heritage Management Plan
	d) refined details (including implementation timeframes) for the mitigation measures outlined in the EIS (sections 7.4.2, 7.4.3, 7.4.6, 7.4.7, 7.4.8 and 7.4.9) and summarised at Annexure A;	General construction	CNVMP AQMP CTMP SWMP Contaminated Land Management Plan Heritage Management Plan CF&FMP Vegetation Management Plan

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
	e) a commitment to ensure no lights are installed above the height of 40 metres or, the maximum approved height of the intermodal warehouse buildings (whichever is less);	General construction – out of hours works	CEMP
	f) identification of the trigger values and criteria for all matters mentioned in condition 7(b) (excluding light spill, land contamination and indigenous heritage) that will be adopted for monitoring and managing potential impacts to Commonwealth land;	General construction	CNVMP AQMP CTMP SWMP Contaminated Land Management Plan Heritage Management Plan CF&FMP Vegetation Management Plan

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
	g) details of a comprehensive monitoring program (including locations, frequency and duration) for: i. validating the anticipated impacts associated with condition 7(b); and ii. determining the effectiveness of proposed mitigation/management measures; h) provisions to revise the approved CEMP in response to monitoring associated with condition 7(g) including, details of response / contingency mechanisms to address any exceedances of the relevant trigger values;	General construction	CNVMP AQMP CTMP SWMP Contaminated Land Management Plan Heritage Management Plan CF&FMP Vegetation Management Plan
	i) evidence of consultation with Defence regarding the adequacy of proposed mitigation measures in particular, those measures to mitigate potential light spill impacts upon residential dwellings within SME outside of standard construction hours; and	Prior to general construction	CEMP
	j) details of a complaints handling procedure;	General construction	Complaints and enquiries procedure, within the CEMP
	Commencement of the action may not occur until the CEMP has been approved. The CEMP must be implemented once approved.	Prior to general construction	CEMP
11	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement any management plan or agreement required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor	General construction	CEMP

Condition No.	Description/Condition	Activity	Sub-plan / PSP Reference
	in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.		
13	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	General construction	CEMP
17	Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all management plans referred to in these conditions of approval on their website. Each management plan must be published on the website within one month of being approved.	General construction	CNVMP AQMP CTMP SWMP Contaminated Land Management Plan Heritage Management Plan CF&FMP Vegetation Management Plan

3.2.4 SIMTA COMMONWEALTH EIS – MITIGATION MEASURES

Table 3-7 Mitigation measures from the SIMTA Commonwealth EIS Approval (Annexure A)

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
7.4.1	Biodiversity	Vegetation clearing Earthworks Drainage Georges River Bridge and Anzac Creek culvert crossing works	Install appropriate drainage infrastructure (e.g. sediment basins, diversion drains), sediment and erosion controls prior to the commencement of construction.	SWMP
			Clearing of vegetation is not to be undertaken during overland flow events.	SWMP
			Clearly identifying sensitive areas and areas for construction and managing clearing such that clearing activities are constrained to these approved areas only.	SWMP
			Locate soil or mulch stockpiles away from watercourses and key stormwater flow paths to limit potential transport of these substances into the watercourses via runoff.	SWMP
			Dust suppression activities to be undertaken where appropriate.	AQMP
			Stabilisation of disturbed areas, including revegetation in accordance with the Vegetation Management Plan (VMP), is to be undertaken as soon as practicable after disturbance.	VMP
			Emergency response protocols and procedures for implementation in the event of a contaminant spill or leak to be clearly articulated in the Construction Environmental Management Plan.	IRMP PIRMP – Rail Link
			Spill kits to be located to allow for timely response to uncontained spills. Site inductions are to include a briefing on the use of spill kits.	IRMP / PIRIMP – Rail link SWMP
			Management of weeds in and adjacent to cleared areas will occur in accordance with a Weed Management Plan. This plan will include details relating to the monitoring, management and where	Vegetation Management Plan

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
			necessary eradication of weeds, disposal of green waste, and vehicle/plant weed wash down protocols if required.	
			Management of noxious weeds are to be undertaken in accordance with the *Noxious Weeds Act* 1993.	Vegetation Management Plan
			Equipment used for treating weed infestation will be cleaned prior to moving to a new area within the project site to minimise the likelihood of transferring any plant material and soil.	Vegetation Management Plan
			Soil stripped and stockpiled from areas containing known weed infestations are to be stored separately and are not to be moved to areas free of weeds.	Vegetation Management Plan
		Vegetation clearing Georges River Bridge and Anzac Creek culvert crossing works Drainage Rail link Temporary works or General construction	Fauna microhabitat such as logs should be removed from areas to be cleared and relocated to suitable nearby bushland areas in the presence of an ecologist.	CF&FMP
			Consider the installation of nest boxes in woodland vegetation in the rail corridor that may offer alternative nesting habitat to hollow-dependent species recorded in the study area.	CF&FMP
			High visibility plastic fencing is to be installed to clearly define the limits of the works area to not further encroach on fauna habitat.	CF&FMP
			Undertake a pre-start up check for sheltering native fauna of all infrastructure, plant and equipment and/or during relocation of stored construction materials.	CF&FMP
			Undertake a two-stage approach to clearing: ▪ Remove non-hollow bearing trees at least 48 hours before habitat trees are removed. ▪ Hollow bearing trees are to be knocked with an excavator bucket or other machinery to encourage fauna to evacuate the tree immediately prior to felling. ▪ Felled trees must be left for a short period of time on the ground to give any fauna trapped in the trees an opportunity to escape before further processing of the trees.	CF&FMP Vegetation Management Plan

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
			Felled hollow bearing trees must be inspected by an ecologist as soon as possible (not longer than 2 hours after felling).	
			Site inductions are to include a briefing regarding the local fauna of the site and identification of protocols to be undertaken if fauna are encountered.	CF&FMP
			If any pits/trenches are to remain open overnight, they are to be securely covered, if possible. Alternatively, fauna ramps (logs or wooden planks) are to be installed to provide an escape for trapped fauna.	CF&FMP
			Clearance of native vegetation should be minimised as far as is practicable.	CF&FMP Vegetation Management Plan
			Consider retention of some, or all, of the remnant scattered *E. sclerophylla* over patches of shrub and grass cover in the cleared grassland immediately south of the SIMTA site, in landscaping works.	CF&FMP
			The extent of, and limitations to, vegetation clearing would be clearly identified on construction plans.	Vegetation Management Plan CF&FMP SWMP
			Any additional construction areas, such as site offices, construction stockpile locations and machinery/equipment laydown areas are to be located, where possible, within existing cleared or disturbed areas.	SWMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
			Extent of clearing should be fenced with highly visible temporary fencing to minimise any extension of clearing beyond the area necessary.	Vegetation Management Plan SWMP
			A Vegetation Management Plan should be prepared prior to construction, detailing restoration, regeneration and rehabilitation of areas of native vegetation in study area. The VMP should also detail appropriate management for the potential habitat of threatened plant species in the study area, including monitoring during and after construction works to ensure impacts are minimised.	Vegetation Management Plan
			As soon as possible rehabilitation will commence where possible. Management of land disturbed as a result of construction works will occur in accordance with a VMP.	Vegetation Management Plan SWMP
			High visibility plastic fencing is to be installed to clearly define the limits of the works area as to not further encroach on EEC and locations of threatened flora species.	Vegetation Management Plan CF&FMP
			Fencing is to be installed delineating threatened species habitat to be retained. Appropriate warning signage is to be installed along this fencing at regular intervals. Site inductions are to include a briefing on the presence of threatened species and its habitat, its significance and locations and extents of no-go zones.	Vegetation Management Plan CF&FMP
		Georges River Bridge and Anzac Creek culvert crossing works Drainage	Minimise clearing and disturbance to the riparian zone where possible.	Vegetation Management Plan
			Install appropriate drainage infrastructure (e.g. sediment basins, diversion drains), sediment and erosion controls prior to the commencement of construction.	SWMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
			Construction disturbance areas will be clearly demarcated to avoid accidental clearing or stockpiling in riparian vegetation.	SWMP
		Hot works (including vegetation clearing requiring heat producing equipment)	Hot work not to be undertaken on declared total fire ban days. Vehicles and plant should not block fire trails. Bushfire awareness included in staff induction and in toolbox talks pre-commencement.	Bushfire Management Plan
		General construction	Frequent maintenance of construction machinery and plant will be undertaken to minimise unnecessary noise.	CNVMP
			Dust suppression activities to be undertaken where appropriate.	AQMP
			Speed limits will be developed so as to minimise the potential for fauna to be struck by a vehicle within the SIMTA site. All vehicles and plant in operation on the SIMTA site are to adhere to site rules relating to speed limits.	AQMP
7.4.2	Air Quality	Vegetation clearing Earthworks	Dust Management: ▪ Increasing the moisture content of the soil/surface to reduce emissions from site clearing, particularly during dry and windy conditions. ▪ Modifying work practices during periods of adverse weather (hot, dry and windy conditions). ▪ Limiting and staging clearing of designated footprint required for construction. ▪ Completing rehabilitation as quickly as possible. ▪ Minimising the number of stockpiles on-site and number of work faces on stockpiles.	AQMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
		Vegetation clearing Earthworks Georges River Bridge and Anzac Creek culvert crossing works Drainage	▪ Modifying work practices during periods of adverse weather. ▪ Limiting the extent of vegetation removal and topsoil to the designated footprint required for the rail corridor. ▪ Limiting and staging clearing of designated footprint required for construction. ▪ Completing rehabilitation as quickly as possible. ▪ Minimising the number of stockpiles on-site and number of work faces on stockpiles. ▪ Use of water sprays for dusty activities such as ballast dumping and compacting.	AQMP
		Demolition	▪ Modify or cease demolition activities during periods of adverse weather (hot, dry and windy conditions). ▪ Special consideration and boundary monitoring to be given for the demolition of buildings containing asbestos.	AQMP
		Access route construction	▪ Using water sprays with earthmoving equipment during road construction ▪ Modifying work practices during periods of high winds and/or dry conditions by limiting scraper/grader activity.	AQMP
		Earthworks – Haulage and heavy plant equipment	▪ Confining all on-site vehicles to a designated route and enforcing speed limits. ▪ Modifying work practices during periods of high winds and/or dry conditions by engaging a water truck to spray travel routes. ▪ Controlling and reducing trip frequency and distance by coordinating delivery and removal of materials to avoid unnecessary trips, where possible. ▪ Cleaning dirt that has been tracked onto sealed roads as soon as practicable. Dirt track-out should be managed using shaker grids and / or wheel cleaning.	AQMP
		Vegetation clearing Earthworks	▪ Avoid unnecessary vegetation clearing ▪ Complete rehabilitation of site as quickly as practical. Wind erosion from temporary stockpiles can be limited by minimising the number of stockpiles on-site and minimising the number of work faces on stockpiles.	AQMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
7.4.3	Hydrology	Bridge works (Georges River bridge)	▪ Works across the bed of the Georges River will be staged to minimise the total disturbance at any given time and to allow the full bypassing of stream flows around the works to maintain fish passage. ▪ The management principles outlined in Managing Urban Stormwater (Landcom 2004) for sites with high erosion potential will be implemented.	SWMP
		Drainage - Anzac Creek culvert crossing works	▪ All reasonable efforts will be taken to program construction activities during those periods when flood flows and fish passage is not likely to occur. As a minimum requirement, fish migrations and breeding periods, as advised by NSW DPI, will be avoided. ▪ Temporary sidetrack crossings will be constructed from clean fill (free of fines) using pipe or box culvert cells to carry flows, or a temporary bridge structure. ▪ All temporary works, flow diversion barriers and in-stream sediment control barriers will be removed as soon as practicable and in a manner that does not promote future channel erosion. ▪ The construction site will be left in a condition that promotes native revegetation and shading of habitat pools. ▪ The management principles outlined in Managing Urban Stormwater (Landcom 2004) for sites with high erosion potential will be implemented.	SWMP
		General construction	▪ A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) will be implemented for the construction and operation phases of the development, with monitoring and review performance of sediment and water control structures during construction and operation phases. The SWMP and ESCPs will be developed in accordance with the principles and requirements of Managing Urban Stormwater (Landcom, 2004).	SWMP
7.4.6	Traffic	General construction	▪ A Construction Traffic Management Plan (CTMP) will be implemented prior to and during the construction phase to adequately manage traffic movements. The CTMP would detail mitigation measures that would be implemented during construction.	CTMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
7.4.7	Noise and vibration	General construction	A Construction Noise and Vibration Management Plan would be developed to implement best practice mitigation and management measures to minimise noise impacts on surrounding land uses and sensitive receivers, including Commonwealth Land during construction. The Construction Noise and Vibration Management plan would address the following noise issues: ▪ Construction hours. ▪ All construction activities would have regard to the standard hours of 07:00 am to 18:00 pm Monday to Friday, and 08:00am to 13:00 pm Saturday (with approval from relevant authorities). Any works undertaken outside of these hours would be undertaken in consultation with relevant authorities, such as RMS, ARTC and utility providers. Works outside these hours that may be permitted would include (Wilkinson Murray, 2013): ▪ Any works which do not cause noise emissions to be audible at any nearby sensitive receptors. ▪ The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. Local residents would be informed of the timing and duration of approved works in accordance with the SIMTA's notification provisions. ▪ Emergency work to avoid the loss of lives, property and/or to prevent environmental harm. ▪ Any other work as approved through the Construction Noise and Vibration Management Plan Process. ▪ Training and awareness, which would include the following: ▪ Site awareness training/environmental inductions to provide instruction on noise mitigation techniques/measures to be implemented during construction of the SIMTA proposal. ▪ Working within approved hours. ▪ Working with noisy equipment away from sensitive receivers. ▪ Using noise screens and temporary barriers ▪ Maintaining plant and equipment. ▪ Turning off machinery when not in use. ▪ Limiting the "clustering" of noisy plant / processes. ▪ Communication, including a notification process to inform residents of respite times.	CNVMP

EIS Section	Aspect	Activity	Mitigation measure	Sub-plan / PSP Reference
			▪ Incident and emergency response. ▪ Non-conformance, preventative and corrective action procedures. ▪ Selection of quiet plant and processes wherever feasible and retrofitting reversing alarms that are quieter and display less annoying characteristics. Such alarms could include “smart alarms” and “squawker alarms”.	
		Demolition Earthworks Drainage Concrete pavement Rail sidings Buildings Gantry cranes	▪ Ground borne vibration levels would be measured and monitored to establish the minimum working separation between the equipment and nearby vibration sensitive receivers and buildings that have the potential to be impacted when vibration-generating equipment is used during construction of the SIMTA proposal.	CNVMP

3.2.5 PROPOSAL MITIGATION MEASURES

Table 3-8 Mitigation Measures – Proposal

No	Mitigation measure	Subplan
0.	**General environmental management**	
0A	A Preliminary Construction Environmental Management Plan (PCEMP) has been prepared for the Proposal. The purpose of this PCEMP is to provide the preliminary, overarching framework for the management of potential environmental impacts resulting from construction activities. A number of other construction related management plans have also been prepared for the Proposal, including: ▪ Preliminary Construction Traffic Management Plan (PCTMP) ▪ Air Quality Management Plan ▪ Erosion and Sediment Control Plans (ESCPs) and Bulk Earthworks Plans, within the Stormwater Drainage Design Drawings ▪ Riparian Vegetation Management Plan and Threatened Flora Species Management Plan. This PCEMP and these management plans will form the basis of the CEMP and associated plans to be prepared for the Proposal, prior to construction. In addition to the preliminary construction management plans, listed above, the following plans, or equivalent, will be prepared as part of the CEMP: ▪ Soil and Water Management Plan (SWMP), prepared in accordance with *Managing Urban Stormwater*, 4th Edition, Volume 1, (2004). ▪ Construction Noise and Vibration Management Plan (CNVMP), prepared in accordance with the *Interim Construction Noise Guideline* 2009 (ICNG) ▪ Contamination Management Plan (CMP) ▪ Health and Safety Plan (HSP), including an Emergency Response Plan.	CEMP
1	**Traffic and Access**	
1A	A Road Safety Audit will be undertaken of Moorebank Avenue and Cambridge Avenue to identify the traffic safety risks associated with construction vehicles using these roads and to determine the appropriate traffic controls to be implemented to mitigate any risks identified as part of the preparation of the Construction Traffic Management Plan (CTMP). The effectiveness of any measures implemented will be monitored during the construction phase.	CTMP
1B	A CTMP will be developed by the construction contractor construction contractor responsible for construction of the Proposal. The CTMP will be developed in accordance with the Preliminary Construction Traffic Management Plan (PCTMP), and will include the following requirements, at a minimum:	CTMP

No	Mitigation measure	Subplan
	▪ A traffic control mechanism will be located at each of the truck entry and exit points from the construction compounds to assist with vehicle movements and pedestrian/cyclist movements during construction, where necessary ▪ In consultation with RMS, Liverpool City Council and Campbelltown City Council , general signposting of the access roads will be undertaken with appropriate heavy vehicle and construction warning signs ▪ Installation of specific warning signs at entrances/exits to the construction site to warn existing road users of entering and exiting construction traffic will be undertaken ▪ Speed limits will be developed so as to minimise the potential for fauna to be struck by a vehicle within the construction areas. All vehicles and plant in operation during construction are to adhere to site rules relating to speed limits. ▪ Pedestrian walking routes and crossing points will be established and clearly marked throughout the construction phase ▪ Where required, appropriate traffic control and warning signs will be installed for areas identified where potential safety risk issues may exist, such as the Cambridge Avenue causeway ▪ The promotion of carpooling for construction staff and other shared transport initiatives during the construction phase will be considered ▪ Where reasonable and feasible, the transportation of construction materials will be managed to maximise vehicle loads and therefore minimise vehicle movements ▪ Site and /or activity specific Traffic Management Plans (TMPs) will be developed, where required by the contractor to allow safe work sites.	
2	**Air Quality**	
2A	The Air Quality Management Plan (AQMP) (or equivalent) will be further progressed and incorporated into the CEMP for the Proposal. In accordance with the AQMP, the following will be addressed in the CEMP: ▪ Procedures for controlling / managing dust ▪ Roles, responsibilities and reporting requirements ▪ Contingency measures for dust control where standard measures are deemed ineffective. Specifically, the AQMP (or equivalent) will prescribe the use of water carts for dust suppression on unsealed travel routes and areas where scrapers and graders are operating.	AQMP
3	**Noise and Vibration**	
3A	A Construction Noise and Vibration Management Plan (CNVMP) (or equivalent) will be developed for the Proposal in accordance with the EPA's Interim Construction Noise Guidelines (ICNG). The following issues will be addressed within the plan:	CNVMP

No	Mitigation measure	Subplan
	▪ Construction activities will have regard to the standard hours of 07:00 am to 18:00 pm Monday to Friday, and 08:00am to 13:00 pm Saturday. Any works undertaken outside of these hours will be undertaken in consultation with relevant authorities. Works outside these hours that may be permitted will include: ▪ Any works which do not cause noise emissions to be audible at any nearby sensitive receptors or comply with the 'Outside Standard Construction Hours' prescribed in Section 9. ▪ The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. ▪ Emergency work to avoid the loss of lives, property and/or to prevent environmental harm. ▪ Works required to be undertaken during track possessions or road closures. ▪ Any other work as approved through the CNVMP Process. ▪ Selection of quiet plant and processes wherever feasible and retrofitting reversing alarms that are quieter and display less annoying characteristics. Such alarms could include "smart alarms" and "quacker alarms". ▪ Provision of training and awareness of administrative measures to reduce noise impacts, which will include the following: ▪ Site awareness training/environmental inductions to provide instruction on noise mitigation techniques/measures to be implemented during construction of the Proposal ▪ Working within approved hours ▪ Working with noisy equipment away from sensitive receivers ▪ Maintaining plant and equipment ▪ Turning off machinery when not in use ▪ Limiting the "clustering" of noisy plant / processes.	
5	**Hydrology**	

No	Mitigation measure	Subplan

5A	A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP), or equivalent, will be implemented, in accordance with the Preliminary Erosion and Sediment Control (PESCPs), included within the Stormwater and Flooding Environmental Assessment Report (Hyder 2015). The following aspects will be addressed within the SWMP and ESCPs:
	▪ The guiding principles for erosion and sediment control within the Blue Book will be adopted in the SWMP and when planning construction works, being:
	  ▪ Minimise the area of soil disturbed and exposed to erosion at any one time.
	  ▪ Priority should be given to management practices that minimise erosion, rather than to those that capture sediment downslope or at the catchment outlet
	  ▪ Divert clean water around the construction site or control the flow of clean water at non-erodible velocities through the construction site
	  ▪ Provision of boundary treatments around the perimeter of construction areas to minimise the migration of sediment offsite.
	  ▪ Permanent or temporary drainage works will be installed as early as practical in the construction program to minimise uncontrolled drainage and associated erosion, including the onsite detention (OSD) and flood conveyance works
	  ▪ Stockpiles will be located away from flow paths on appropriate impermeable surfaces, to minimise potential sediment transportation. Where practicable, stockpiles will be stabilised if in place for more than ten days and will be formed with sediment filters in place immediately downslope
	  ▪ Existing catchments and sub-catchment boundaries will be maintained as far as practicable
	  ▪ Site imperviousness and grades should be limited to the extent of existing imperviousness and grades under existing development conditions.
	  ▪ Rehabilitate disturbed lands as soon as practicable
	▪ The wheels of all vehicles will be cleaned prior to exiting the construction site where excavation occurs to prevent the tracking of mud. Where this is not practical, or excessive soil transfer occurs onto paved areas, street cleaning will be undertaken when necessary.
	▪ Inspection of all permanent and temporary erosion and sedimentation control works prior to and post rainfall events and prior to closure of the construction site.
	▪ Erosion and sediment control structures to be cleaned, repaired and augmented as required.
	▪ Where required, sediment basins and their outlets will be designed to be stable in the peak flow from at least the 10-year ARI time of concentration event. Sediment basins should be sized to accommodate the 5 day, 80th percentile storm event, with sufficient size and capacity to manage Type F soils. Sediment basins must be regularly cleaned to maintain the design capacity. Prior to discharge from sediment basins, water will be tested for the following parameters to identify construction impacts:
	  ▪ pH
	  ▪ Turbidity / Total Suspended Solids (TSS)
	  ▪ Oil and grease.
		SWMP
		ESCP

No	Mitigation measure	Subplan
5B	During construction of the Georges River bridge the construction contractor will develop a Project Specific Procedure (PSP), or equivalent that will specify how works within and adjacent to the river will be managed to minimise environmental impacts. The PSP will specify the following measures: ▪ Should piling platforms be used for construction of the Georges River bridge, the size and formation of the piling platforms will be designed to accommodate flood events that are likely to occur during the works. Flows of the Georges River will be maintained at all times between the two piling platforms. The stream width will be maintained such that there will be minimal erosion of the working platforms from high velocity flows. ▪ Works across the bed of the Georges River will be staged to minimise the total disturbance at any given time and to allow the full bypassing of stream flows around the works to maintain fish passage. In particular, consideration will be given to avoid bridge piling and construction of any temporary work platforms in the Georges River during winter when the Australian bass migrates ▪ Scour protection works around piers, along creek banks and on bridge abutments should be installed as early as possible ▪ Measures to contain potential pollutants should be installed in-stream, such as silt curtains to contain sediment ▪ Material for the formation of piling platforms must be clean material with minimal fines ▪ Measures to manage runoff from the bridge approaches / abutments must be established as early as possible ▪ Management measures identified in the PSP will be developed to address the requirements for high erosion hazard sites, in accordance with the requirements of the Blue Book. ▪ Monitoring of water quality will be undertaken within the Georges River upstream and downstream of the proposed bridge during concreting works. Should pH levels outside the range prescribed by ANZECC for Lowland Rivers be detected, dosing or equivalent measures, will be implemented within the silt curtains to bring the pH level back within acceptable limits ▪ A dewatering procedure to manage groundwater ingress during piling works for construction of the Georges River bridge. The dewatering procedure will specify testing of extracted groundwater quality prior to discharge to the Georges River, if appropriate quality is met, or treatment and/or offsite discharge if the water quality is insufficient to immediately return to the river.	PSP – Georges River bridge
5C	The following management measures will be implemented during works in and adjacent to Anzac Creek to mitigated potential impacts on water quality during construction: ▪ All reasonable efforts will be taken to program construction activities during those periods when flood flows and fish passage is not likely to occur ▪ Any temporary sidetrack crossings will be constructed from clean fill (free of fines) and where required to maintain flows, will use appropriately sized pipe or box culvert cells , or a temporary bridge structure ▪ Temporary structures used for the construction of the culvert within Anzac Creek will be designed so that they can accommodate flows to minimise potential flooding impacts when prolonged or intense rainfalls are predicted. Any structures that impede flow will be readily removable or collapsible, to allow flood waters to flow within the channel, in the event of prolonged or intense rainfall.	PSP – Anzac Creek

No	Mitigation measure	Subplan
	▪ All temporary works, flow diversion barriers and in-stream sediment control barriers will be removed as soon as practicable and in a manner that does not promote future channel erosion ▪ The construction site will be left in a condition that promotes native revegetation ▪ The management principles outlined in *Managing Urban Stormwater* (Landcom 2004) for sites with high erosion potential will be implemented.	
5G	A Flood Emergency Response Plan (FERP) will be developed for the Stage 1 site. The FERP will take into consideration, site flooding and broader flood emergency response plans for the Georges River and Anzac Creek floodplains and Moorebank area. The FERP will also include the identification of an area of safe refuge within the SIMTA site that will allow people to wait until hazardous flows have receded and safe evacuation is possible.	Flood Emergency Response Plan - Construction
6	**Geotechnical and soils**	
6A	Prior to finalisation of detailed design of the Rail link through the Glenfield Waste Facility, further geotechnical investigations will be undertaken in the vicinity of the proposed Rail link to further determine the type and characteristics of soils. Additional mitigation measures will be included within the CEMP as relevant.	CEMP / SWMP
6B	Excavated material will be reused on site where possible. Any excavated material that requires disposal will be subject to waste classification under the *Waste Classification Guidelines 2014* (NSW EPA, 2014) and will be disposed of at an appropriate licensed facility.	Waste Minimisation and Management Plan
6C	The construction contractor will progress the Bulk Earthworks strategy which will outline the volumes of imported and exported material, any buffer areas, temporary soil stockpiling areas and fencing of excavations, as required.	Bulk Earthworks / SWMP
7	**Contamination**	
7A	All remediation works will be undertaken in accordance with the requirements of the Remediation Action Plan (RAP) (JBS&G, 2015a) and recommendations for additional sampling and remediation.	CMP
7B	A Health and Safety Plan (HSP) and risk assessment will be developed and implemented prior to construction commencing and all construction workers and staff will be inducted into the plan.	HSP
7C	A Contamination Management Plan (CMP) will be developed for the Proposal, and included in the CEMP, that will contain detailed procedures on:	CMP

No	Mitigation measure	Subplan

	▪ Handling, stockpiling and assessing potentially contaminated materials encountered during the development works.
	▪ A management tracking system for excavated contaminated materials to ensure the proper management of the material movements at the site, particularly during excavation and bioremediation works.
	▪ Assessment, classification and disposal of waste in accordance with relevant legislation.
	▪ Specific contingency measures in the unlikely event that construction of the Rail link in the Glenfield Waste Facility results in the disturbance of existing landfill cells. Including:
	  ▪ Management of construction works in areas potentially impacted by asbestos via an Asbestos Management Plan
	  ▪ Management of excavation work to minimise the potential for surface or groundwater infiltration into the excavations, thereby potentially increasing the volume of leachate in the impacted cells. This will include the routine monitoring of leachate levels and groundwater surrounding the impacted areas using existing monitoring infrastructure.
	  ▪ Management of landfill gas via the implementation of field screening and personal monitoring programs targeting landfill gasses
	  ▪ Management of impacted soils using the Material Management Procedures
	  ▪ Replacement or relocation of existing monitoring wells that may be impacted by the construction work. The impact to existing monitoring wells and the alternate locations of any replacement wells will be subject to negotiations with the proponents of the Glenfield Waste Facility and the NSW EPA to ensure that existing environmental protection licence requirements are satisfied.
	  ▪ Should future design iterations identify that landfill containment may be compromised, a specific work plan will be developed to address potential environmental and/or health and safety issues that may arise.
	▪ A contingency plan for unexpected contaminated materials, such as materials that are odorous, stained or containing anthropogenic materials, that may be encountered during construction.	

8	**Biodiversity**	

8A	A Flora and Fauna Management Plan will be prepared as part of the CEMP. Native vegetation clearing will not occur until the Flora and Fauna Management Plan is approved. The Flora and Fauna Management Plan will include the following measures as a minimum:
	▪ Site inductions are to include a briefing regarding the local threatened flora and native fauna of the site and protocols to be undertaken if they are encountered
	▪ If any animal is injured, contact the relevant local wildlife rescue agency (e.g. WIRES) and/or veterinary surgery as soon as practical. Until the animal can be cared for by a suitably qualified animal handler, if possible minimise stress to the animal and reduce the risk of further injury by:
	  ▪ Handling fauna with care and as little as possible.
	  ▪ Covering larger animals with a towel or blanket and placing in a large cardboard box.
	  ▪ Placing small animals in a cotton bag, tied at the top.
	  ▪ Keeping the animal in a quiet, warm, ventilated and dark location.
	▪ Clearing of vegetation will be timed to avoid periods when rain is forecast in accordance with Chapter 4.4.2 of 'the Blue Book'
	▪ The extent of vegetation clearing is to be clearly identified on construction plans. Clearly identifying sensitive areas ('no-go areas') which cannot be impacted by construction and managing clearing such that clearing activities are constrained to these approved areas only. High visibility plastic fencing is to be installed to clearly define the limits of the works area within the Rail link specifically the Southern Boot Land, and works areas at the riparian corridor of the Georges River.
	▪ In circumstances where native vegetation or mature tree clearing is required outside of the biodiversity study area, an ecologist will inspect the proposed area and provide advice on the impact to flora and fauna and appropriate management.
	▪ Management of noxious weeds is to be undertaken in accordance with the *Noxious Weeds Act* 1993 and include details relating to the monitoring, management and where necessary eradication of weeds, disposal of green waste, and vehicle/plant weed wash down protocols if required.
	▪ Equipment used for treating weed infestation will be cleaned prior to moving to a new area within the Proposal site to minimise the likelihood of transferring any plant material and soil.
	▪ Soil stripped and stockpiled from areas containing known weed infestations are to be stored on cleared land at least 40 m from native vegetation
	▪ Water from the truck wash down in the Rail East Compound will be captured and disposed of offsite to prevent weed spread to adjoining native vegetation
	▪ Works areas at each watercourse crossing will be clearly delineated prior to commencement of works
	▪ Undertake a two-stage approach to clearing:
	  ▪ Remove non-hollow bearing trees at least 48 hours before habitat trees are removed.
	  ▪ Hollow bearing trees are to be knocked with an excavator bucket or other machinery to encourage fauna to evacuate the tree immediately prior to felling.
		CF&FMP

No	Mitigation measure	Subplan
	▪ Felled trees must be left for a short period of time on the ground to give any fauna trapped in the trees an opportunity to escape before further processing of the trees. ▪ Felled hollow bearing trees must be inspected by an ecologist as soon as possible (not longer than 2 hours after felling). ▪ Fauna microhabitat (such as hollow logs) should be removed from areas to be cleared and relocated to suitable nearby bushland areas in the presence of an ecologist ▪ Large woody debris will be retained in watercourses where possible. In the event large woody debris are to be impacted they will be relocated in consultation with an ecologist ▪ Instream works at Georges River and Anzac Creek will be minimised where possible, including disturbance to aquatic vegetation. Disturbed areas will be contained to the 20m wide corridor ▪ If any pits/trenches are to remain open overnight, they are to be securely covered, where reasonable and feasible. Alternatively, fauna ramps (logs or wooden planks) are to be installed to provide an escape for trapped fauna ▪ Undertake a pre-start up check for sheltering native fauna of all infrastructure, plant and equipment and/or during relocation of stored construction materials ▪ Directional lighting will be used where lighting is required in construction areas.	
8B	Riparian vegetation within and adjoining areas of impact will be managed in accordance with the measures detailed in the Riparian Vegetation Management Plan. Disturbed riparian areas in the Georges River will be revegetated with locally occurring native species as soon as practicable upon completion of bridge works.	VMP
8C	A nest box management strategy will be prepared prior to clearing of hollow bearing trees. The strategy will inform the installation of nest boxes in retained native vegetation in the riparian corridor of the Georges River and the woodland in the Southern Boot Land and the on-going monitoring and maintenance of nest boxes through the construction and operational phases.	Biodiversity Offset Strategy / Management Plan
8D	An ecologist will undertake pre-clearance surveys to confirm the absence of Grey-headed Flying-fox roosting camps within the Rail link, no more than 48 hours prior to the clearance of vegetation. The DotE will be notified in writing of the results of pre-clearance surveys. If the species is detected roosting on site, no native vegetation clearance will commence until any directions of the Minister have been complied with.	CF&FMP
8E	Works within the Southern Boot Land, or in other areas, with the potential to impact on *Persoonia nutans* and *Grevillea parviflora* subsp. *parviflora* will be undertaken in accordance with the Threatened Flora Species Management Plan.	Threatened Flora Species Management Plan

No	Mitigation measure	Subplan
9.	**Indigenous Heritage**	
9C	Management of Aboriginal heritage will be managed through the CEMP for the Proposal. The CEMP will include the following at a minimum: ▪ A summary of the findings of the draft *Aboriginal Heritage Impact Assessment* (AHMS, 2015) ▪ Measures to be implemented in the event of an unexpected archaeological and cultural finds (including human remains) ▪ All relevant personnel and contractors involved in the construction of the Proposal will be advised of the relevant heritage considerations, legislative requirements and recommendations in the draft *Aboriginal Heritage Impact Assessment* (AHMS, 2015) ▪ Installation of temporary fencing for the protection of the riparian corridor along the western bank of the Georges River ▪ Areas that have been subject to assessment in the draft *Aboriginal Heritage Impact Assessment* (AHMS, 2015) should be clearly identified on construction plans. Should construction activities be proposed to extend beyond this boundary, appropriate heritage investigations will be undertaken to identify and manage Aboriginal objects/ sites/ places that may be in the additional area(s).	Heritage Management Plan
10.	**Non-Indigenous Heritage**	
10C	A Heritage Management Plan in adherence to NSW Heritage Council guidelines will be prepared as part of the CEMP for the Stage 1 Proposal. At a minimum the following measures will be included within the Heritage Management Plan: ▪ Archaeological monitoring during construction will be conducted for a representative sample of the sites PADs F and G (to the south, and south west of Building No. 11, respectively) of former structures. Excavation of these sites will be directed by an Excavation Director, who is experienced in investigations of locally significant archaeology. ▪ The archaeologist will assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action. ▪ If unexpected finds are located during works, an archaeological consultant will be engaged to assess the significance of the finds and the NSW Heritage Council notified. Further archaeological work or recording may be recommended.	Heritage Management Plan

No	Mitigation measure	Subplan
11A	The following mitigation measures will be included within the CEMP to mitigate impacts on visual amenity during construction of the Proposal: ▪ Existing vegetation around the perimeter of Proposal site will be retained where feasible and reasonable ▪ The early implementation of landscape plantings will be investigated in order to provide visual screening along Moorebank Avenue ▪ Elements within construction areas will be located to minimise visual impacts as far as feasible and reasonable, e.g. setting back large equipment from site boundaries ▪ Design of site hoardings will consider the use of artwork or project information ▪ Regular maintenance will be undertaken of site hoardings and/or fencing and perimeter areas including the prompt removal of graffiti. ▪ Re-vegetation / landscaping would be undertaken progressively and with species local to the area. ▪ Use of trees on the southern and western boundaries of the Stage 1 site, to provide a uniform canopy cover within vegetated areas and use of local species as understorey planting to support and enhance local habitat.	SWMP / Landscape Plan
12.	**Hazard and Risk**	
12A	A Health and Safety Plan (HSP) will be prepared for construction of the Proposal that will identify all responsibilities and requirements under the Work Health and Safety Act 2011. The HSP will include an Emergency Response Plan, for construction of the Proposal. These will be developed collaboratively with the construction contractor, in consultation with the NSW Police Force, NSW Fire Brigade, NSW Rural Fire Service and the Ambulance Service of NSW. The Emergency Response Plan will include the following: ▪ Emergency response protocols and procedures for implementation in the event of a contaminant spill or leak ▪ Provision of spill kits ▪ Bushfire awareness included in staff induction and in toolbox talks pre-commencement.	HSP
12B	With respect to asbestos management, the obligations, roles and responsibilities for personnel involved in the Stage 1 Proposal will be identified, documented and communicated. These responsibilities are identified in the Work Health and Safety Act 2011. Prior to commencement of construction an Asbestos Management Plan is to be developed in accordance with C*ode of Practice How to Manage and Control of Asbestos in the Workplace* (WorkCover NSW, 2011a) for the Proposal. The Asbestos Management Plan will reference the asbestos register and risk assessment, which will also be prepared prior to construction being undertaken. The Asbestos Management Plan will address the following aspects, at a minimum: ▪ Demolition of the three structures (Buildings 1, 2 and 20), will be undertaken in accordance with *Code of Practice How to Safely Remove Asbestos* (WorkCover NSW, 2011b) ▪ Asbestos removal work will be carried out by an asbestos removalist who is appropriately licensed to carry out the work.	Asbestos Management Plan

No	Mitigation measure	Subplan
12H	The Stage 1 site will be protected from the impact of fires originating from off-site by a 35 metre defendable space to the west across Moorebank Avenue, a 100 metre defendable space to the south of the container handling area. The design and installation of on-site fire hydrants within the Stage 1 site will be in compliance with *AS 2419.1-2005 Fire hydrant installations - System design, installation and commissioning*.	HSP / Emergency Response Plan
13.	**Waste**	
13A	Measures to mitigate the effect of the construction waste streams will be incorporated into the Proposal's Construction Environmental Management Plan (CEMP). Waste management principles that will be incorporated into the CEMP relating to materials purchasing include: ▪ Avoidance and reuse of material will have priority over recycling ▪ Recycling will have priority over disposal ▪ Earth excavated from the site will be used for fill material and landscaping where feasible ▪ If possible concrete components will be crushed and reused onsite, with the remainder sent to a recycling facility ▪ Waste generation will be minimised by ordering the correct quantity of materials ▪ Selection of materials which maximise recycled content, while having low embodied water and energy use ▪ Selection of materials which maximise durability and lifespan. The following procedures and protocols will be considered within the CEMP regarding waste management: ▪ Characterisation of construction waste streams ▪ Management of any identified hazardous waste streams ▪ Procedures to manage construction waste streams, including handling, storage, classification, quantification, identification and tracking ▪ Mitigation measures for avoidance and minimisation of waste materials ▪ Procedures and targets for reuse and recycling of waste materials. ▪ Inclusion of the waste management strategies included in the Concept Plan Statement of Commitments for construction waste management.	Waste Minimisation and Management Plan
14.	**Bushfire**	
14A	A bushfire management strategy, or equivalent, will be prepared as part of the CEMP for the construction phase. The strategy will include: ▪ Emergency response plans and procedures ▪ Restrictions on activities (namely hot works) that cannot be undertaken on total fire ban days within areas of high Bushfire Hazard Rating, unless otherwise advised by the NSW Rural Fire Service.	Emergency Response Plan / HSP

No	Mitigation measure	Subplan
	▪ All construction site offices and temporary buildings will be located outside buffer areas to ensure minimum setbacks of 10 m. ▪ All construction site offices will be accessible via access roads suitable for firefighting appliances similar to NSW Rural Fire Service category 1 tankers.	
16.	**Greenhouse Gas and Climate Change**	
16A	A Greenhouse Gas Management Plan will be developed for the construction phase of the Proposal and included in the CEMP. Where appropriate, the mitigation measures, management strategies and abatement opportunities presented in the Greenhouse Gas and Climate Change Impact Assessment (Hyder Consulting, 2015) will be reviewed and considered for incorporation into the CEMP. The Greenhouse Gas Management Plan will adopt the following measures: ▪ Where possible locally sourced materials will be used to reduce GHG emissions associated with transport ▪ Construction and demolition waste will be recovered and recycled where possible, and vegetation waste will be composted ▪ Construction works will be planned to minimise double handling of materials ▪ Recycled materials will be reused where possible to reduce GHG emissions associated with embodied energy ▪ Construction/transport plans will be incorporated within the CEMP to minimise the use of fuel during construction ▪ Fuel efficiency of the construction plant/equipment will be assessed prior to selection, and where practical, equipment with the highest fuel efficiency and which uses lower GHG intensive fuel (e.g. biodiesel) will be used, where practicable ▪ On-site vehicles will be fitted with exhaust controls in accordance with the Protection of the Environment Operations (Clean Air) Regulation 2010 as required ▪ Regular maintenance of equipment will be undertaken to maintain good operations and fuel efficiency ▪ Where practicable trucks removing waste from the Proposal site or bringing materials to the Proposal site will be filled to the maximum amount allowable, depending on the truck size and load weight, to reduce the number of traffic movements required ▪ Consideration will be given to the embodied energy content of construction materials selected	GHG Management Plan
17.	**Socio Economic**	
17A	A community information and awareness strategy will be included in the CEMP and will outline measures to maintain communication with the community and all relevant stakeholders throughout the construction of the Proposal.	CEMP

No	Mitigation measure	Subplan
17B	The CEMP will prescribe measures to be implemented to minimise impacts on surrounding communities. These measures will include: ▪ Work hours during construction will generally be limited to standard construction hours, unless otherwise authorised within the CEMP ▪ Ensuring land owners, within proximity of the Proposal site, are kept well informed about the Proposal, the construction hours and duration of the works. ▪ Land owners impacted by the construction works will be provided relevant contact details to address queries relating to the works.	CEMP

3.2.6 PROPOSAL CONDITIONS OF APPROVAL

The Proposal conditions of approval applicable to the construction works must be identified and the section of the CEMP or the Environmental Work Method Statement (EWMS) or Project Specific Procedure (PSP) that addressed the requirement should be identified.

3.2.7 EPL REQUIREMENTS

Schedule 1 of the POEO Act identifies the scheduled activities (premises-based and not premises-based) which require an EPL. 'Railway systems activities' are a premises-based scheduled activity relevant to the construction and operation of the Rail link for the Proposal.

The Construction Contractor responsible for construction of the Rail link will therefore be required to obtain an EPL for construction of the Rail link.

The EPL criteria and conditions applicable to the construction works must be identified and the section of the CEMP or the EWMS / PSP that addressed the requirement should be identified.

Table 3-9 EPL Conditions

EPL condition number	Description/Condition	Sub-plan / PSP Reference

3.3 ENVIRONMENTAL ASPECTS AND IMPACTS

During development of the CEMP the Construction Contractor shall establish, implement and maintain a procedure(s):

a to identify the environmental aspects of the proposed construction activities

b to determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects).

This information must be captured in the form of an Environmental Risk Register.

3.3.1 ENVIRONMENTAL RISK REGISTER

The Construction Contractor will be required to develop an Environmental Risk Register for each works package for the Proposal. The risk register will identify all construction activities with the potential to cause environmental harm and to assign a risk ranking based on the likelihood and consequence of the incident occurring.

A risk management approach will be used as a guideline to determine the severity and likelihood of specific activities impact on the environment and prioritise its significance. This process considers potential regulatory and legal risks as well as taking into consideration the concerns of community and other key stakeholders.

The risk assessment objectives are to:

- Identify activities/aspects, events or outcomes that have the potential to adversely affect the local environment and/or human health/property.
- Qualitatively evaluate and categorise each risk item.
- Assess whether risk issues can be managed by environmental protection measures.
- Qualitatively evaluate residual risk with implementation of measures.

Risk assessments for the Proposal should be based on AS/NZS 4360:2004, the Australian standard for risk assessments. Risk category is determined on the basis of consideration of the likelihood of an impact occurring and the consequences of the impact occurring. The criteria for evaluating likelihood and consequence are identified in Table 3-10 and Table 3-11 respectively.

Table 3-10 Criteria for evaluating likelihood

Level	Descriptor	Description	Frequency Of Occurrence
A	Almost Certain	Is expected to occur in most circumstances	Once per month
B	Likely	Will probably occur in most circumstances	Between once a month and once a year
C	Possible	Might occur at some time	Between once a year and once in 5 years
D	Unlikely	Could occur at some time	Between once in 5 years and once in 20 years
E	Rare	May occur in exceptional circumstances	Once in more than 20 years

Table 3-11 Risk analysis categories and criteria for risk ranking

Likelihood	Consequence				
	1 – Not significant	2 – Minor	3 – Moderate	4 – Major	5 – Severe
A – Almost certain	Moderate	Moderate	High	Very High	Very High
B – Likely	Low	Moderate	High	Very High	Very High
C – Possible	Low	Low	Moderate	High	High
D – Improbable	Low	Low	Low	Moderate	Moderate
E – Rare	Low	Low	Low	Low	Moderate

Mitigation strategies must be developed to manage the environmental risks identified and the residual risk assessed, in line with the mitigation measures identified above. All environmental and planning approval requirements associated with the construction activity should also be identified within the risk register.

The register must be reviewed regularly as construction activities change and in response to seasonal changes.

Construction Contractor to develop an Environmental Risk Register for each works package, to be reviewed and updated as activities change.

3.4 ENVIRONMENTAL POLICY

All construction works for the Proposal would be undertaken in accordance with an environmental policy, developed as part of the Proposal, prior to commencement of construction. The policy must demonstrate the commitment to continual improvement in environmental performance and compliance with applicable legal requirements.

3.5 OBJECTIVES AND TARGETS

To assess environmental performance during the construction phase of the Proposal, a series of environmental objectives and targets would be established. These objectives are developed through the environmental assessment and risk assessment process. Objectives and targets are consistent with the Proposal environmental policy, this aims to assist the monitoring whether environmental commitments are being met. These targets are to be incorporated into relevant environmental management sub-plans.

Construction Contractor to develop an Environmental Risk Register for each works package, to be reviewed and updated as activities change.

Construction Contractor to develop environmental objectives and targets, consistent with the environmental policy and report against compliance with these targets and objectives.

4 IMPLEMENTATION AND OPERATION

The CEMP is the overarching management plan for a suite of environmental management documents during construction. It must provide a structured and systematic approach to environmental management.

The primary purpose of the system of documentation is to:

Ensure compliance with all applicable environmental laws, obligations and approvals.

To minimise environmental impacts.

The structure of the environmental management system is to be implemented for each stage of the Proposal. Figure 4-2 below illustrates the environmental management system structure that would be adopted within the CEMP.

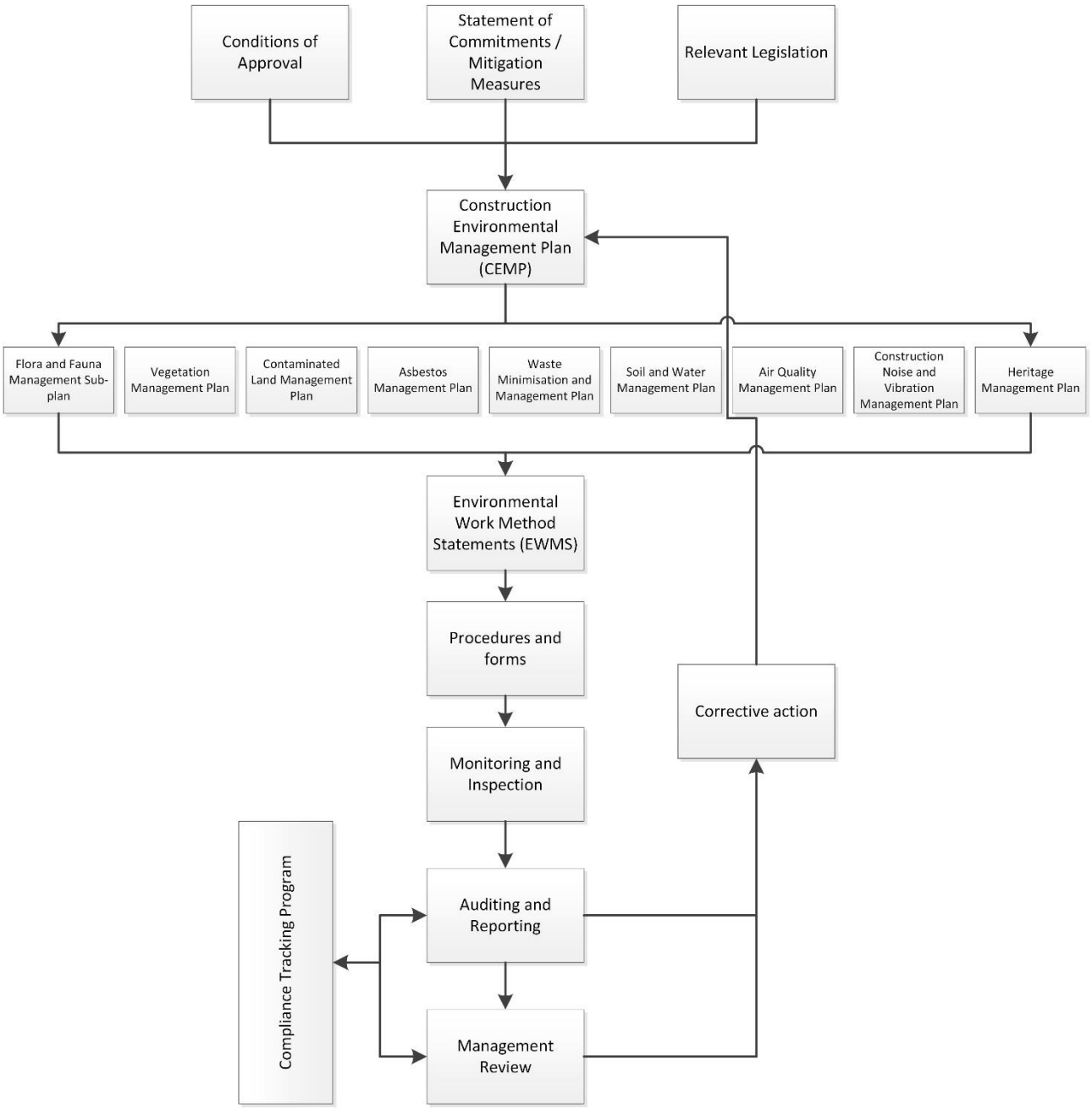

Figure 4-2 Environmental management system structure

4.1 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION

4.1.1 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

The CEMP must provide the system to manage and control the environmental aspects of the Proposal during construction. The strategies defined in the CEMP and associated sub-plans should be developed with consideration of the approval requirements, safeguards and mitigation measures presented in the environmental assessment documents and all relevant legislation. The CEMP must establish the system for implementation, monitoring and continuous improvement to minimise impacts from the Proposal on the environment.

The CEMP is consistent with:

Guideline for the preparation of Environmental Management Plans (DIPNR, 2004).

AS/NZS ISO14001: 2004, '*Environmental Management Systems - requirements with guidance for use*'.

As required, the CEMP is expected to be provided to the Secretary of Planning and Environment for approval and must be provided to the Director of the Department of the Environment for approval prior to commencement of construction.

4.1.2 ENVIRONMENTAL MANAGEMENT SUB PLANS AND STRATEGIES

Environmental management sub plans support the CEMP. These documents are prepared to classify requirements and process that are applied to specific impacts of the activities that would be identified in accordance with Section 3.3. They address requirements of the measures identified in the environmental assessment documentation and any conditions of approval relating to the Proposal.

Additional environmental strategies may be developed as required throughout the various stages of construction of the Proposal and aim to guide the management of potential environmental factors onsite. These strategies and measures would be incorporated into the sub-plans as appropriate.

Table 4-12 below lists the various sub plans and strategies identified in mitigation strategies and statement of commitments for the SIMTA Project. The need for approval of sub-plans by the Commonwealth and State departments for each package of works should be identified in the CEMP.

Table 4-12 Construction sub plans

Sub-plan name
Construction traffic management Sub-plan (CTMP)
Construction Flora and Fauna Management Sub-plan (CF&FMP)
Threatened Species Management Sub-plan (to be incorporated into the Construction Flora and Fauna Management Sub-plan)

Sub-plan name
Vegetation Management Sub-plan (VMP)
Weed Management Sub-plan (WMP) (to be incorporated into the Vegetation Management Plan)
Construction Noise and Vibration Management Sub-plan (CN&VMP)
Construction Soil and Water Management Sub-plan (SWMP)
Construction Heritage Management Sub-plan (CHMP)
Construction Air Quality Management Sub-plan (CAQMP)
Contaminated Land Management Sub-plan (CLMP)
Pollution Incident Response Management Plan (PIRMP) – Rail link
Emergency Response Plan
Complaints and Enquiries Management Procedure (included within CEMP)

Construction Contractor to prepare all subplans required to support the CEMP and submit to SIMTA's Principal Representative for review.

4.1.3 PROGRESSIVE EROSION AND SEDIMENT CONTROL PLANS

The SWMP will contain further detail on the development of Erosion and Sediment Control Plans (ESCP's) and all erosion, sediment and pollution controls to be employed on site during construction.

Progressive ESCP's must be prepared for each stage of works relating to the Proposal and catchment that is disturbed during construction.

The ESCP's must consider the following, where necessary:

a The method of vegetation removal in intermittent watercourses, leaving grasses and small understorey species undisturbed wherever possible;

b Erosion and sediment control measures required before clearing and grubbing of the site;

c Appropriate controls before the removal of topsoil and commencement of earthworks for the formation.

d Other water quality structures shown on the drawings; and the use of energy dissipaters to reduce discharge velocities at all sediment basins to velocities that are appropriate to the receiving stream / creek conditions;

e How upstream water will be managed and diverted around disturbed areas so it is not polluted by the construction activities;

f Scour protection measures for haul roads and access tracks where necessary;

g The methods for stabilising temporary drains;

h The methods to minimise erosion and sedimentation during construction of embankments and other earthworks;

i The methods of constructing batters to assist the retention of topsoil on sloped land;

j Temporary sediment trapping measures in median areas at regular intervals;

k The methods of maintenance of erosion and sediment control basins including measures to restore the capacity of sediment basins;

l The details of the inspection and maintenance program for all erosion and sediment controls to ensure that no disturbed area is left without adequate means for containment and treatment of contaminated water; and

m Measures to minimise erosion and control sedimentation from stockpiles.

4.1.4 PROCEDURES, FORMS AND OTHER DOCUMENTS

The CEMP must document the requirements for environmental management system procedures, forms and other documents, provide instructions and records related to both environmental and non-environmental activities during construction of each stage of the Proposal.

Project specific procedures (PSPs) would be developed in accordance with the requirements for each stage of the Proposal. A PSP is a description of a specific activity or series of activities. It lays down the general course of events stating who is responsible for doing what, when and how.

PSPs would be developed for all high risk activities and environmental monitoring including:

- Working platforms in or adjacent to waterways.
- Temporary waterway crossings.
- Site compound establishment.
- Public road accesses and managing mud tracking.
- Batch plant establishment and operation.
- Managing runoff from curing processes.
- Clearing and grubbing.
- Sediment basin design, construction and management.
- Dewatering.
- Contaminated soil management.
- Piling
- Water sampling
- Dust monitoring
- [Construction Contractor to include additional activities following the environmental risk review].

4.2 RESOURCES, ROLES, RESPONSIBILITIES AND AUTHORITY

This section of the CEMP must be completed to identify the key project team and the order of authority and accountability.

The following sections summarise the anticipated roles and responsibilities during construction.

4.2.1 SIMTA PRINCIPAL REPRESENTATIVE

The general environmental responsibilities of the Principal Representative would include the following:

Reviewing the CEMP and sub-plans to ensure that it meets all relevant regulatory and Project requirements.

Reviewing the Contractor's environmental monitoring reports and compliance documentation to confirm that the CEMP and sub-plans are being implemented.

Stop work immediately if an activity is witnessed by SIMTA's Principle Representative where an unacceptable environmental impact may occur.

4.2.2 CONSTRUCTION CONTRACTOR

The general environmental responsibilities of the Principal Contractor would include the following, but not limited to:

Ensuring the requirements of the CEMP are fully implemented, and in particular, that environmental requirements are not secondary to other construction requirements.

Liaising with relevant government authorities as required and to obtain necessary approvals.

Participating and providing guidance in the regular review of the CEMP and supporting documentation.

Providing adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of the CEMP.

Ensuring that all personnel receive appropriate induction training, including details of the environmental and community requirements.

Ensuring that complaints are investigated to ensure effective resolution.

Stop work immediately if an activitiy is witnessed where an unacceptable environmental impact is likely to occur.

Construction Manager

The general environmental responsibilities of the Construction Manager would include the following, but not limited to:

- Planning construction works in a manner that avoids or minimises impact to environment.
- Ensuring the requirements of the CEMP are fully implemented.

- Ensuring construction personnel manage construction works in accordance with statutory and approval requirements.
- Ensuring environmental management procedures and protection measures are implemented.
- Ensuring all project personnel attend an induction prior to commencing works.
- Liaising with relevant government authorities as required.
- Stop work immediately if an unacceptable impact on the environment is likely to occur.

Environmental Manager

The general environmental responsibilities of the Environmental Manager would include the following, but not limited to:

- Overall responsibility for the implementation of environmental matters on the project.
- Development, implementation, monitoring and updating of the CEMP and sub plans in accordance with ISO14001.
- Report to Principal Contractor and other senior managers on the performance and implementation of the CEMP
- Ensure management reviews of the CEMP are undertaken annually, documented and actions implemented.
- Ensure environmental risks of the Project are identified and appropriate mitigation measures implemented.
- Identify where environmental measures are not meeting the targets set and where improvement can be achieved.
- Ensure environmental protocols are in place and managed.
- Ensure environmental compliance.
- Obtain and update all environmental licences, approvals and permits as required.
- Lead liaison with appropriate approval authorities.
- Manage environmental document control, reporting, inductions and training.
- Manage environmental reporting within the project team and regulatory authorities.
- Preparing reports on an annual basis outlining the project works undertaken and the achievements that have been met, as well as identifying those areas where improvements were made.
- Oversee site monitoring, inspections and audits.
- Manage all subcontractors and consultants with regards to environmental matters, including assessing their environmental capabilities and overseeing the submission of their environmental documents.
- Develop and facilitate induction, toolbox talks and other training programs regarding environmental requirements for all site personnel.
- Notify relevant authorities in the event of an environmental incident and manage close-out of these.
- Stop activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-conformities, and advise the Principal Contractor.
- Resolve environment-related complaints.

Wider Project Team (including sub-contractors)

All site personnel would have responsibility for environmental management. General environmental management responsibilities would include, but not limited to:

- Comply with the relevant requirements of the CEMP, or other environmental management guidance as instructed by a member of the project's management team.
- Participate in the mandatory Project/site induction program.
- Report identifiable environmental incidents to the foreman immediately.
- Undertake remedial action where possible to ensure environmental controls are maintained in good working order.
- Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Contractor, Construction Manager, or Environmental Manager immediately.

4.3 SUB-CONTRACTOR MANAGEMENT

Environmental requirements and responsibilities would be specified to sub-contractors. This requirement would be captured within the CEMP.

All sub-contractors would be required to work in accordance with the approved CEMP.

All sub-contractors are required to attend relevant project and/or site inductions where the requirements and obligations of the CEMP are communicated. A record of all sub-contractors inducted would be maintained as part of the project induction.

4.4 CEMP AVAILABILITY

The CEMP would be made available to all site personnel and a copy would be kept in the main site work office for each works package. It would be made available to regulatory agencies on request.

5 COMPETENCE, TRAINING AND AWARENESS

To ensure that the CEMP are effectively implemented, each level of management will be responsible for ensuring that all personnel reporting to them are aware of the requirements of the CEMP.

The Construction Contractor will be responsible for the preparation, delivery and implementation of the following, to be included within the CEMP.

Environmental induction:

All personnel (including sub-contractors) would attend a compulsory site induction that includes an environmental component prior to commencement of works on-site. This is done to ensure all personnel involved in the Proposal are aware of the requirements of the CEMP applicable to their package of works, and to ensure the implementation of environmental management measures.

A record of all environment inductions would be maintained and kept on-site. The Environmental Manager may authorise amendments to the induction at any time.

Other forms of environmental communication and training

Within the CEMP the Construction Contractor must consider other forms of environmental training and communication, which may include:

- Toolbox talks
- Project meetings
- Environment meetings
- Pre-start meetings
- Sub-contractor meetings

5.1.1 COMPLAINTS AND ENQUIRES PROCEDURE

A procedure for handling complaints, consistent with AS 4269: Complaints Handling, would be developed for the Proposal and implemented during construction. A telephone number or email address would be established for the community response during construction.

Attempts would be made to resolve all complaints in accordance with the complaints handling procedure. In accordance with AS 4269, an initial response to complaints would be provided within 48 hours of a complaint being received. A further detailed response, including steps taken to resolve the issue(s) that lead to the complaint, would be provided.

The Environmental Manager must apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting from community complaints.

6 INCIDENTS AND EMERGENCIES

The CEMP must include a plan on management of environmental incidents and emergencies.

This section of the CEMP must be completed by the Construction Contractor and must contain details of:

- Key emergency response personnel showing responsibilities and contact details including all-hours telephone numbers.
- Emergency services, their location and contact numbers (e.g. ambulance, fire brigade, spill clean-up services).
- Emergency communications processes.
- Containment measures to be taken in the event of emergency situations that may arise during construction and procedures for restoration.
- The location on site of the register of, and information on, hazardous materials including Material Safety Data Sheets (MSDS).
- Definitions for incident classification and lines of reporting for each incident level.

6.1 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN – RAIL LINK

As noted in Section 3.2, an Environment Protection Licence (EPL) would be required for construction of Rail link. Under the *Protection of the Environment Operations Act* 1997 (POEO Act) it is a requirement for each licence holder to develop, test and implement when necessary a Pollution Incident Response Management Plan (PIRMP).

The PIRMP must contain the information specified in the POEO Act, the *Protection of the Environment Operations (General) Regulation* 2009, and relevant guidelines published by the NSW Environment Protection Authority.

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the Construction Contractor must immediately notify each relevant authority and implement the PIRMP (section 153F, POEO Act). The Principal Contractor, Construction Manager, Environmental Manager and the EPA must also be notified immediately in the event of an incident.

7 INSPECTIONS, MONITORING AND AUDITING

7.1 ENVIRONMENTAL INSPECTIONS

7.1.1 REGULAR AND POST RAINFALL SITE INSPECTIONS

If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are compromised, they would be recorded during regular inspections. Records would also include details of any maintenance required, the nature of the deficiency, any actions required and an implementation priority.

Prior to the commencement of significant packages of work, an inspection would be carried out and would include a check of relevant environmental controls and resources required to ensure effective construction activity and maintenance.

A pre-works inspection form must be developed and included as an appendix to the CEMP.

7.2 ENVIRONMENTAL MONITORING

Monitoring would be undertaken to validate the impacts predicted for the Proposal, to measure the effectiveness of environmental controls and implementation of the CEMP, and to address approval requirements. The monitoring requirements for required aspects must be included in the relevant environmental management sub-plans and summarised in Table 7-13, below.

Table 7-13 Environmental monitoring

Aspect	Source Location	Indicator	Target	Frequency of Measurement	Monitoring Point	Discharge Point	Reference
Vegetation Clearing	Rail Corridor	# hectares cleared	Insert sum of total estimated clearing in Rail Corridor	Annual	Rail Corridor	NA	*Environment Protection and Biodiversity Conservation Act* 1999 Environmental Offsets Policy, October 2012 (SEWPAC)
Air Quality	Rail Corridor	Depositional dust	< 4 g/m^2/month at sensitive receivers (as an annual average)	Monthly	Nominated Sensitive Receivers	Construction areas	EPA Environment Protection Licence
	Rail Corridor	Light Scattering Real Time instrument – PM_{10}	< 50 µg/m^3 (max 24-hr average) and < 30 µg/m^3 (annual average)	Quarterly	Nominated Sensitive Receivers	Terminal and warehouse areas and rail corridor.	EPA Environment Protection Licence
Stormwater Management	Progressive construction sites	Oil and Grease Total Suspended Solids pH	For the 100 percentile concentration limit: Oil and grease < 10 mg per litre TSS < 50 mg per litre pH 6.5 - 8.5	Prior to discharge from site	Sediment basins and discharge points	Defined	EPA Environment Protection Licence (Rail link) SWMP Managing Urban Stormwater: Soils and Construction (Vol. 1 4th Edition)

Aspect	Source Location	Indicator	Target	Frequency of Measurement	Monitoring Point	Discharge Point	Reference
European Heritage	SIMTA site	# buildings removed/relocated # of significant archaeological deposits encountered,	As per Heritage Management Plan Appropriate management of archaeological deposits encountered.	Initial monitoring during excavation and demolition works. If highly significant remains are identified during monitoring, further monitoring of additional sites of former structures would be completed.	At sites of building demolition and areas of surface disturbance Archaeological monitoring of a representative sample of the sites of former structures that would be subject to proposed subsurface impacts. Monitoring undertaken by a suitable archaeologist with Excavation Director Criteria qualifications,	NA NA	Heritage Management Plan Artefact, 2012. A comprehensive archaeological research design must be prepared for the archaeological monitoring once the details of the proposed development have been finalised.
Noise Generation	Progressive construction sites	$L_{A10\ (15\ min)}$ noise level	Residential RBL + 10 dB; <75dBA Sensitive land uses <45dBA Recreational Areas <65dBA Industrial Premises < 75dBA Offices/Retail < 70dBA Ground Borne noise Evening (18:00 pm to 22:00 pm) Internal: $L_{Aeq\ (15\ min)}$ 40 dBA Night-time (22:00 pm to 07:00 am)	Monthly during construction and event or incident based	At most affected sensitive receiver (SME Residential, DNSDC Office/Industrial, Wattle Grove, Moorebank, Casula)	Various construction locations across the site.	Interim Construction Noise Guideline (DECC July 2009 - now OEH)

Aspect	Source Location	Indicator	Target	Frequency of Measurement	Monitoring Point	Discharge Point	Reference
			Internal: $L_{Aeq\ (15\ min)}$ 35 dBA				
Vibration	SIMTA site	Maintained stability and structural integrity of heritage buildings.	3mm/s	During construction. If it is absolutely necessary to operate a vibratory roller within 20 metres of buildings of potential heritage significance, vibration levels should be monitored during the operation to verify compliance with criteria	20 metres from buildings of potential heritage significance	N/A	Wilkinson Murray, 2012 (See Table 4-13 within Appendix H of the EIS).
Operating Hours	Progressive construction sites	Daily operating hours for construction purposes Number of out-of hours operations	No work outside of construction operating hours - excluding exemptions for site delivery/emergency response	Daily	Construction Management	NA	EPA Environment Protection Licence conditions (Rail link)
Waste Generation	Progressive construction sites	Tonnes of C&D Waste Tonnes of waste -type Tonnes of waste -destination	NA - Tracking for due diligence only	Monthly	Construction Management	Whole of site	Waste Minimisation and Management Plan

7.3 AUDITING AND REPORTING

7.3.1 CONTRACTOR AUDITS

Internal auditing would be undertaken 6 monthly throughout the construction of the Stage 1 Proposal. The CEMP must include a section that establishes a schedule of audits. The purpose of auditing is to verify compliance with:

- The CEMP and sub-plans.
- Approval requirements (conditions of approval and mitigation measures identified in environmental assessment documents).
- Any relevant legal and other requirements (e.g. licenses, permits, regulations).

An audit checklist must be developed and amended as necessary to reflect changes to the CEMP, subsequent approvals and changes to relevant Acts, regulations or guidelines.

7.3.2 INDEPENDENT EXTERNAL AUDITS

External auditing would be undertaken by an independent environmental auditor in accordance with ISO 19011:2003 - *Guidelines for Quality and/ or Environmental Management Systems Auditing,* as required by project approvals.

The CEMP must contain a schedule for audits of environmental compliance. This should include both internal and external audits.

7.4 COMPLIANCE TRACKING PROGRAM

A Compliance Tracking Program must be developed within the CEMP. The key objective of Compliance Tracking Program (CTP) is to identify the applicable requirements of the planning approvals and environmental legislation during the construction phase(s) of the project.

The CTP would be an appendix to the CEMP and the Construction Contractor would be responsible for maintaining the CTP and for the preparation of monthly compliance tracking reports. The compliance tracking reports would be provided to the SIMTA Principal Representative.

7.5 OTHER REPORTING

7.5.1 EPBC APPROVAL COMPLIANCE REPORTING

Condition 12 of the EPBC Controlled Action Approval requires a report to be submitted to the Department of the Environment every 12 months from commencement of construction, addressing compliance with each of the conditions of approval, in the form of a Compliance Report.

The Construction Contractor's CEMP must identify the reporting requirements under the EPBC Controlled Action Approval and ensure sufficient information has been collected over the 12 month period to inform the compliance report..

7.5.2 POEO ACT REPORTING

Section 66(6) of the POEO Act requires that holders of an EPL make their pollution monitoring data publicly available in a timely manner. The intention of this new requirement is to improve the general public's access to information about the environmental performance of licensed activities.

The specific requirements for the publication of monitoring results are set out in section 66(6) of the POEO Act as follows:

> *"The holder of a licence subject to a condition referred to in subsection (1)(a) must, within 14 days of obtaining monitoring data as referred to in that subsection:*
>
> *(a) if the holder maintains a website that relates to the business or activity the subject of the licence – make any of the monitoring data that relates to pollution, and the licensee's name, publicly and prominently available on that website in accordance with any requirements issued by in writing by the EPA, or*
>
> *(b) if the holder does not maintain such a website – provide a copy of any of the monitoring data that relates to pollution, to any person who requests a copy of the data, at no charge and in accordance with any requirements issued in writing by the EPA."*

There is a penalty for not publishing or making available the results of monitoring in accordance with section 66(6).

The CEMP must identify the reporting requirements under the EPL and a PSP must be developed for reporting the outcomes of monitoring to the EPA.

The Construction Contractor is required to implement a table which sets out the reporting requirement applicable to the Proposal, timing of the reporting, who is responsible for managing preparation of the reports and the intended recipient(s) when more information is made available in accordance with relevant legislation.

7.6 NON-CONFORMITY, CORRECTIVE AND PREVENTATIVE ACTIONS

The CEMP must be specify that any member of the project team may raise a non-conformance or improvement opportunity. A non-conformance is the failure or refusal to comply with the requirements of the CEMP and supporting documentation.

For each non-conformance identified a corrective/preventative action (or actions) must be identified and implemented. In addition any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Non-conforming activities may be stopped by relevant authorities, SIMTA's Principal Representative, Construction Contractor, Construction Manager and Environmental Manager (or delegate(s)), project / site Engineers following consultation with the Construction Manager. The works would not commence until a corrective / preventative action has been closed out. In such circumstances a non-conformance report must be prepared and recorded accordingly.

The Construction Contractor is required to develop a process for identifying, implementing and reporting on corrective actions.

7.7 REVIEW AND IMPROVEMENT

An effective environmental management system and plan includes processes that allows for continual improvement. The CEMP must identify the processes for providing effective feedback on the environmental performance of construction and updates or amendments of the CEMP, sub-plans, and PSPs should it be recognised where mitigation strategies are not achieving compliance. Figure 7-3 illustrates the principle of continual improvement through planning, implementing, acting and monitoring the environmental performance of the project, during the construction phase.

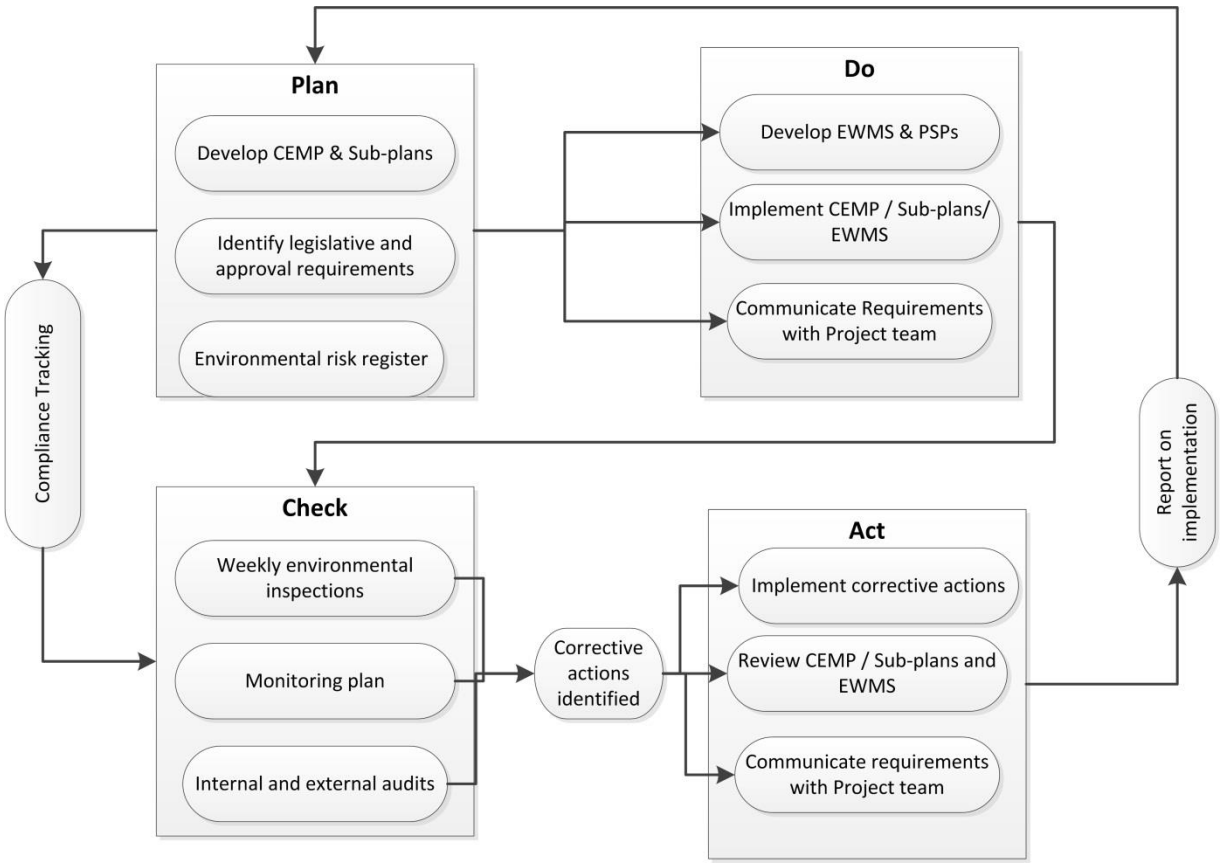

Figure 7-3 Continuous improvement

The Construction Contractor is required develop a process for continuous review and improvement that would be documented within the CEMP.

8 DOCUMENTATION

The CEMP must include a section to identify the documentation requirements for environmental management of construction of the Proposal. The section must identify the responsibilities of the project team for capturing and keeping data and documents.

The Construction Contractor is required to develop and implement as system for document control for documents relating to environmental management and compliance. This must be documented within the CEMP.

8.1 ENVIRONMENTAL RECORDS

The Environmental Manager would be responsible for maintaining all environmental management documents as current at the point of use.

The Construction Contractor is required to develop and implement a process for control of all environmental records, including:

- All monitoring, inspection and compliance reports/records.
- Correspondence with relevant authorities.
- Induction and training records.
- Reports on environmental incidents, other environmental non-conformances, complaints and follow-up action.
- Community complaints information.
- Minutes of CEMP and construction environmental management system review meetings and evidence of any action taken.
- Review and update of documents in accordance with changes to legislation and activities on site.

8.2 DOCUMENT CONTROL

The Construction Contractor would coordinate the preparation, review and distribution of environmental management documents, as appropriate. Environmental documents would be stored at the construction site for ready reference.

The Construction Contractor is required to develop and implement a document control procedure to control the flow of documents within and between SIMTA's Principal Representative, stakeholders and subcontractors.

The procedure must also ensure that documentation is:

- Developed, reviewed and approved prior to issue.
- Issued for use.
- Controlled and stored for the legally required timeframe.
- Removed from use when superseded or obsolete.
- Archived.

A register and distribution list must identify the current revision of particular documents or data. Document control would be in accordance with ISO 14001.